

## Agenda Item #5 – Investigative Hearing

Chair Ginn Marvin read a statement aloud and introduced the Commission members, director and counsel. She said that the hearing would be in three parts regarding:

- the expenditures of MCEA funds by the campaign to elect Julia St. James for Senate District 14 in 2004,
- expenditures of MCEA funds by the campaign to elect Sarah Trundy to House District 96 in 2004,
- preparation and distribution of certain literature distributed in connection with a special election for House District 18 in Biddeford in 2004

Chair Ginn Marvin continued to say that the Commission had subpoenaed four witnesses for the meeting at hand; Julia St. James, Sarah Trundy, Jessica Larlee. Chair Ginn Marvin stated that there was a subpoena for Daniel Rogers, but he had disappeared and was not served with the subpoena. She went on to say that the other three witnesses were there to testify and were sequestered until they were brought in for the interview.

Julia St. James was called to the witness stand and sworn in by Chair Ginn Marvin.

Q. Do you swear or affirm that the testimony you are about to give will be the truth, the whole truth, and nothing but the truth so help you God?

A. I swear that it will be the truth, but I do not...swear under God.

Q. Thank you; welcome.

The director thanked Ms. St. James for being at the hearing; Ms. St. James replied that she just wanted to do the right thing and that she had also just come from the hospital.

The director stated that he would be asking Ms. St. James a series of questions and there would be some labeled documents he would be asking her to look at.

### Testimony of Julia St. James.

Q. Were you a candidate in the 2004 general election?

A. Yes

Q. What office did you run for?

A. State senate

Q. What district?

A. 14

Q. What towns compile the district?

A. Buckfield, Jay, Hebron, Canton were the areas covered.

At this point Chair Ginn Marvin stated that they needed the note from Ms. St. James' doctor to put into their records. Chair Ginn Marvin also asked if Ms. St. James was under

any medication. Ms. St. James replied she was, but it would not alter her testimony in any way as she was telling the truth.

The questioning resumed.

Q. Were you involved in a political party when you ran for office?

A. I believe I was enrolled as Republican, but I had to unenroll to become an Independent.

Q. When your name appeared on the ballot, it was not as a Democrat or Republican?

A. No

Q. Was there a name that appeared on the ballot though?

A. Yes, the Fourth Branch Party.

Q. Did you register with the Commission as a candidate?

A. I do not remember the details of that; I didn't do the paperwork.

Q. This is the first exhibit I would like to show you, it's labeled St. James Exhibit 1 and is the candidate registration for your campaign. Does it look familiar?

A. No, obviously I signed it, but I didn't read it.

Q. Who prepared it for you?

A. My guess would be Jessica

Q. And who is Jessica, what is her full name?

A. Jessica Larlee.

Q. How did the idea of running for office first occur to you?

A. Well, first of all, I was arrested for two felonies of marijuana cultivation and alleged trafficking. At that point, I was so outraged at the unfairness of the law that when Jessica called, I was visiting her aunt, and asked if I wanted to run for office. I thought "yeah" because I did not want to sit down and shut up.

Q. Who was the friend whose house you were at that day?

A. Kathy Lelanski

Q. Whose idea was it to run for office?

A. That was Jessica's. She phoned up and we were all partying over at Kathy's house and she asked if I wanted to run for office.

Q. Just to clarify, who was on the phone and who was in the room? Jessica Larlee was?

A. Jessica was on the phone with me, I believe we were in the garage at the time. Kathy was there, Jessica's cousin Jenna was there. I think it was around 1:30.

Q. And you mentioned someone named Dan. What's his full name?

A. Dan Rogers.

Q. Was he there?

A. No, he wasn't there.

Q. Did you have a follow up conversation with them about the idea of running for office?

A. Yeah, I think I talked to them on the phone and we met up at my house.

Q. Did you meet Dan Rogers later on?

A. Oh yeah, he came over

Q. That same day?

A. No, a couple of days later.

Q. So who came over?

A. Dan Rogers and Jessica Larlee.

Q. What did you do?

A. We spent the whole afternoon goofing around, riding around, exploring my mountain, just wandered around and got to know each other. Talked about it and I don't remember the specifics.

Q. How was it that you decided to run for office in the State Senate?

A. I didn't actually. They just sort of asked, "Do you want to run?" We were at a party so I wasn't really paying attention. A few days later when we did get together I asked them what exactly I was running for. She viewed it as an opportunity to talk more about the marijuana laws and give her input.

Q. They suggested to you to run for State Senate office?

A. Yes.

Q. Did they ever bring up the idea of running for a county office?

A. No.

Q. House of representatives?

A. No, not at all.

Q. Did they even give any proposals to you about how you would pay for your campaign?

A. Oh, yeah. I mean I knew nothing about it, but they told me about the Clean Election fund and that specifically in my district that Bruce Bryant would be running as a Clean Election Act candidate and Bob Cameron would not as he was a Republican and they were certain that he would get a lot of money on his own, but it wouldn't come in until

the very end. They said that specifically my district was a place where there was a lot of money to be had.

Q. What do you mean by that, a lot of money to be had?

A. That they knew that Bob Cameron would raise a lot of money on his own, but it wouldn't show up because the money would be there at the end.

Q. Did they say anything to you about the oversight of the MCEA by the Commission?

A. No.

Q. Do you have any idea why they recruited you to run for office?

A. Um, well, I can give you my opinion. They figured I was a stoner with a head injury and they could pretty much take the checkbook and run with it.

Q. I know you had a head injury and you feel that it has something to do with everything that happened. I would like to give you the opportunity to go into more detail. Would you like to do that now or later?

A. Whatever you want.

Q. To your knowledge did Dan Rogers and Jessica Larlee encourage any other candidates to run?

A. Yes, absolutely.

Q. Which other candidates?

A. That I know of, Sarah Trundy and a bum called Major Pike. Apparently he has an apartment through the disability act somewhere in Lewiston, but he lives under a bridge.

Q. Do you know whether Major Pike ran for office?

A. I do not.

Q. What public issues did you talk about in your campaign?

A. Primarily decriminalization.

Q. In what?

A. About the paper mills polluting the air and water, about Bruce Bryant and his OUI conviction. I don't know, I always had issues with the paper mills and how they like to throw their weight around.

Q. Any other issues in the campaign?

A. No, but if I had a chance I would introduce Sunday hunting.

Q. Did you believe you could win the office of State Senate when you started the campaign?

A. I was skeptical. There were different times when I was optimistic about it and I realized that it was unlikely, but I actually believed that if the law was going to change someone had to start. After being arrested what became really obvious to me all these

people, at least 30%-40% of the people that live in my area either grow or smoke marijuana, these people are respectable hard-working citizens with children and none of them stand up and say what they really believe in. I felt since I was already convicted of felonies regarding marijuana that I should stand up for them.

Q. In your opinion were you trying to run a real campaign?

A. Absolutely.

Q. You mentioned that you ran under the name of Forth Branch Party. Who came up with that name?

A. Jessica and Jenna.

Q. What was the idea behind the name?

A. Well, one of the reasons that everyone liked it was because the idea was the people of the forth branch had been done already. Jenna liked it because Jessica said she could be the party whip and Jenna thought it sounded pretty cool to be called the party whip of the Forth Branch Party.

Q. Did any other candidates run under that Party name?

A. As far as I know, Sarah Trundy did, but I don't know that for a fact.

Q. Could you please elaborate more on your statement that you were running a legitimate campaign?

A. Absolutely. I spent every cent of my personal money going out and getting the signatures and contributions I needed to even get on the register. I spent my time, my energy, everything and I was absolutely trying to get decriminalization looked into and still am. It's very important to me and my district. The idea that this was a joke...it was no joke to me. I realized that getting into it would be issues that I care very much about.

Q. Tell the Commission members the type of personal effort you put into this campaign.

A. Going door-to-door, talking to everyone I knew, going to parties and making speeches and all the other stuff: getting the signatures, getting the contributions. I made one of the opening speeches at a Ralph Nader event. Okay, it may be Ralph Nader, but it's still a Presidential candidate. To be able to make an opening speech for a Presidential candidate is pretty cool. Every day I worked; I worked hard on this.

Q. At the time you started the campaign with Dan & Jessica, going back in time, when was that?

A. Let's see, sometime in the spring because I know they said we were getting started a little late, not too late, my guess would be sometime around April, May. I would have to look back at my criminal charges for a better date.

Q. Going back to that time, what did you envision your campaign would be like, in terms of communications, etc?

A. Well, one thing was they told me that we would be doing a series of three newsletters and each one would be like building on the previous one. It would go out to the entire

district and we were going to go out and go to every house and shake every hand. Jessica was going to take notes of everything they said, what their issues were and we were going to contact them back. We were going to have speeches. Jessica wanted to have a parade and there were a million ideas. I didn't expect all of them to happen, but did think that some of them would.

Q. How many of them did happen?

A. Near zero.

Q. You mentioned your \$5 contributions. I would like to enter Exhibit #2, the form that candidates use to request public funds when they turn in their qualifying contributions.

Does that look familiar to you?

A. Well, it's got my name on it. I'm sure that it's obvious that I signed it. My guess is that Jessica handed it to me and said we needed it for the Clean Election fund. I have no clear memory of this exactly, but obviously that's the case.

Q. If I could draw your attention to the forth bullet point on Exhibit 2. That refers to a one page document that where we lay out what candidates can and can't spend their public funds on. Do you know whether you read that?

A. No, I did not read it.

Q. Were you aware generally that the public funds that you received were to be spent on campaign related services only?

A. Pretty much, yeah.

Q. Do you remember what lead you to think that?

A. I figured it was Jessica and Dan's thing. They had all this experience and had more knowledge than I did when it came to that.

Q. Did your campaign file reports of your campaign expenditures with the Commission?

A. Yes.

Q. I would like to enter them into the record. They are numbered 3, 4A, 4B, 5A, 5B & 6. Do you recognize them?

A. No.

Q. Do you see a line for the candidate signature on the bottom of the pages?

A. Uh huh

Q. Is that your signature?

A. Yep.

Q. Who prepared those reports?

A. Ah....

Q. We'll start with the initial couple.

A. Well it looks like Jessica did, her name is on that. Somebody put my name as Treasurer on this one, probably Dan.

Q. For the sake of our records could you please start at the top, refer to the number at the top left and go through each exhibit individually.

A. Okay. Exhibit 3.

Q. Any idea who prepared that one?

A. Ahh, it looks like Jessica Larlee.

Q. Okay, thank you. Moving on to the next one.

A. 4A, it was Jessica Larlee. 4B....

Q. On 4B, it was signed in December, do you have any idea who would have prepared that report for you?

A. My guess is Rob Campbell.

Q. And who is Rob Campbell?

A. Ahh, still my husband.

Q. And you believe he prepared it and you signed it, right?

A. Yes.

Q. Moving on to 5A. That was dated October 27<sup>th</sup>, any idea who prepared that one?

A. Rob.

Q. 5B which is dated December 14<sup>th</sup>, who prepared that one?

A. I'm guessing Rob also.

Q. On Exhibit #6, do you know who prepared that one?

A. It had to be Rob.

Q. During the course of these questions, I would like to go over a few of your expenditures with you and what I have done is taken out the expenditure pages of all of those reports. I put them together in order. That is Exhibit #7.

A. Okay.

Q. Did the campaign have a bank account?

A. Yes.

Q. Where was that bank account?

A. Androscoggin Bank.

Q. And who opened it?

A. I did and Jessica. No, Jessica was with me. Do you want the whole story?

Q. We do want the story, if you could just speak up a little louder.

A. Okay. The initial check from Clean Election funds was just under \$17,000. It was sent to Jessica, but she couldn't cash it. About the same time was when I started getting a really bad feeling so I called her aunt, my friend Kathy Lelanski, and asked her what she knew about Dan and Jessica. Are they for real? What's the scoop here? Because I am getting a bad vibe. She said that she knew they had been investigated for something, but she wasn't sure what. I had already heard about that, I asked her if she knew of anything else. She replied not that she knew of, and she didn't want to speak ill of her niece. I said, "Okay." I believe that was a Saturday. Jessica and Dan had called to let me know they had received the check and needed to me to open a checking account in order for them to cash it. I wanted them to think I was half in the bag so I poured myself a big glass of wine so when they got there they thought I was drunk. We went to Auburn to the bank that was nearest Dan Rogers's apartment. It happened to be my bank. So when I walked in, I already had an account there. I opened a third account, the St. James for Senate account, and they asked me if I wanted anyone else's name on the account. I said, "No." There was no way I was going to give a kid a checkbook with this much money in it and I was already not trusting them. They were rip shit; they wanted money and they wanted it right then and there. Dan wanted at least \$800. I was thinking to myself that there was no way the bank was going to hand over that much money on a check that hasn't been cashed no matter who it's from. They did give \$100 and I gave them \$60 and kept \$40 for myself. We were all broke. I had spent all of my money doing all this other stuff. That was the first day of the checking account and why Jessica's name was never on the account.

Q. So who did have access to the account?

A. Me.

Q. Did you ever get a debit card for that account?

A. No.

Q. I'm sorry, was there anything else you wanted to add to the story?

A. Ah, no, that's pretty much it; just that I was getting a bad vibe and that they had no clue that it was my bank.

Q. One thing that I am having a problem understanding is why, in early July when you opened the bank account, you're saying that you already had concerns about them. You didn't want them writing checks on the account and yet you gave them an awful lot of money over time. Can you go into why you gave them so much money?

A. Sure, right off the bat the deal we had discussed, when it first came up that first day they came to visit, they said they were going to run my campaign for \$5,000. Now, I didn't ask them what all that entailed, I just assumed that two people over the course of so many months. I didn't expect them to do it for free. I fully accepted that other expenses, like printing and whatever, were separate from that. I had no problems with that. And then, shortly after I paid them, I don't know how much, Dan told me I needed to write a check to him for eight hundred and something and Jessica for two hundred something. I asked what for and Dan told me it was because "Jessica did some writing



and I did this and that.” It didn’t hit me right then because I am not a cheap person and I don’t sweat the small stuff, but it occurred to me why this was not part of the \$5,000. And so I thought about it and filed it in my memory and thought to myself, “Okay, no more of that.” I did confront Dan about it. The thing about Dan is he is a really personable guy. It’s really easy to like him; he’s smart and he’s funny and he really does have a lot of political experience. I really did go to Augusta to the Nader hearing and I watched Dan get up and do his thing. He did get me the speaking engagement for Nader. I watched him run the Nader campaign for Maine and Massachusetts. I watched him do a number of things that did give him some credibility. Now, you hear that politicians are like car salesmen so I figured it was part of the deal. Okay, they’re kind of slimy, but if they do what they say they are going to do then I guess that’s the way the game works.

Q. And did they do what they said they were going to do?

A. No.

Q. I want to go into that more later on. There are some documents I want to get into the record. Do you recognize these?

A. They look like bank statements to me.

Q. What’s the exhibit number on that?

A. Ah, eight.

Q. And we were able to obtain them through your cooperation, is that right?

A. Yes.

Q. You signed an authorization form allowing the Commission to retrieve your bank statements.

A. Yes.

Q. Did the campaign receive copies of bills, receipts and invoices in connection with the expenditures?

A. Tried to, yeah.

Q. Who kept them?

A. Well, at first Jessica did and at a certain point Jessica became an extreme liability to say the least. I did manage to get what I believe are most of the receipts she had and I tried to save as many receipts as I could. I’m not very good at that stuff, but I tried to just keep them all in a pile.

Q. Was there a time when the Commission sent you a letter requesting those documents?

A. I would think so, probably. You ought to know. (Laughing) I tried to give you everything you wanted.

Q. I would like to hand over to you a couple of exhibits. These are marked St. James 9, St. James 10 & St. James 11. Do those look familiar?

A. Yeah, I think they do. They look like something Rob prepared actually.

Q. That's Robert Campbell?

A. Yes.

Q. So, which one looks like something Rob prepared?

A. All of them I think.

Q. I would like to draw your attention to Exhibit 10. Does that look familiar to you?

A. (nods)

Q. Is that something Mr. Campbell prepared?

A. Yeah, I think so. Well, I'm sure so, because Jessica never did anything like this.

Q. So, he had gathered them, but what are the documents?

A. I don't know...it looks like receipts? Yeah, it's a bunch of receipts.

Q. I want to go more into the services provided to you by Dan Rogers and Jessica. Did Dan Rogers have a specific title in connection with the campaign?

A. Yeah, campaign manager.

Q. What services did you understand he was going to provide?

A. Well, I didn't really know him I guess, specifically what he was going to do. I assumed he knew what he was going to do. I expected that there were going to be newspapers sent out, palm cards, there was potentially going to be cable advertising. And oh yeah, a lot of mailings and supposedly there was going to be a telephone thing that we were doing through supposedly the Republican Party where they have a recording message that asks us to say something like, "Hi this is Julia St. James and I am running for state Senate, calling to see if you have any concerns or whatever." It only actually happened if it got a person's answering machine picked up. If a live person picked the phone up it would hang up. So, everybody in the district would be called, annoying them. I didn't like it, but he assured me it was effective. And that it would look like little old me was calling everyone up to say, "Hi and how you doing?" when in reality it was just a recording that would only play for machines. That never happened.

Q. I want to ask you about that further on because there larger expenditures that he made later on in the campaign. Going back to your payments you made to Mr. Rogers, your first payment was how much?

A. I don't remember. What is it here? Oh okay, well let's see. Um, the first one was \$5,000, which was the amount we said he would get for running the campaign.

Q. Is there a date on it?

A. June, it says June.

Q. There was a June 2<sup>nd</sup> payment of \$5,000, is that right?

A. Probably, you would know what the date of the checks going out better than I would.

Q. There is a payment of \$5,000 on June 22<sup>nd</sup>.

A. Yeah, that sounds about right. What date did the first check go out, do you remember? Was it June? (the director replied that it was around July 1<sup>st</sup>.)

Q. June 21<sup>st</sup> was the deposit of the first check for \$16,900.

A. So yeah, the 22<sup>nd</sup> would be about right then.

Q. Is it your testimony that it is for the amount of his services?

A. Yes.

Q. What was Jessica Larlee's position on the campaign?

A. Treasurer.

Q. And what did you understand she was going to do for the campaign?

A. She was going to do all the paperwork.

Q. And when you say paperwork, what are you referring to?

A. All of this stuff. Receipts, um, the reports. Whatever needed to be done because I don't do paperwork.

Q. Do you intend for them to be paid separately?

A. No, I understand that the \$5,000 I paid to them would be for her and Dan.

Q. Did she do what she said she was going to do?

A. No. (The director asked her to go into detail regarding that.) Okay. She started out just as a really good looking, intelligent, well presented. I was very impressed with her early on. Ah, she and I went out in my jeep and drove around my district and I knocked on doors. The first day we were at the Rumford Main street post office, getting signatures, and then we did go around and knock on a lot of doors. I didn't know what to say so she would get up and give them a sales pitch, or whatever. She was supposed to be keeping track of who said what, what their concerns were so we could go back to them later and say the right thing so as not to look stupid. She really didn't do this at all. Then after a week or so she wouldn't even get out of the jeep at all. And so I did it myself, largely in Hartford, Canton, Hebron, Buckfield, and some in Rumford. Mostly what Jessica did in Rumford was go to bars and pick up guys and get signatures.

Q. So, was there a period of time during the campaign when she did keep records, receipts and so forth?

A. There was a time.

Q. How long did that last?

A. Ah, well, it diminished rapidly from the beginning. I would say the first month or so. The first couple of weeks she was good. And then it got less and less and less as she got stranger and stranger.

Q. Going back to Dan Rogers. Did he help collect the \$5 qualifying checks?

A. He might have done a couple, but that wasn't his deal. Jessica was the queen of the \$5ers. And at first she did well, you know, she did very well going out and talking to people and all of that. But then the dreadlocks set in and the weirdness set in.

Q. Any idea what percentage of an effort did Jessica made as opposed to you during the campaign?

A. I don't know, what did I tell you before? It was 75% or 85% me doing the work. I got out and knocked on doors. I got chased away from people's houses. I really did do it. I mean, I worked hard. It is really hard to go up to someone's door and ask for \$5.

Q. Did Dan Rogers collect any petition signatures for you to get on the ballot?

A. Yeah, a few.

(At this point the director instructed Ms. St. James to be as precise as she can in answering questions as they are trying to determine what happened. She agreed and they went over the question again.)

Q. Did Dan Rogers collect any petition signatures for you to get on the ballot?

A. Yes.

Q. About how many do you think he got.

A. The only time I remember him actually collecting signatures was the first day that we were in front of the post office in Rumford. We were all accosting people when they walked by and he got some, I have no idea how many.

Q. Other than that time in Rumford do you remember him collecting more signatures?

A. Never.

Q. Did your campaign do any advertising in newspapers?

A. No.

Q. Did you do any advertising in radio?

A. No.

Q. Did you do any advertising on TV?

A. No.

Q. It was your earlier testimony that this was a real campaign?

A. Yes.

Q. And your campaign...our records indicate that Dan Rogers got \$2,000. But are you saying that he didn't make any effort to do those things?

A. Well I was promised that we were going to.

Q. Who promised?

A. Dan. It was his idea to do the cable and advertising. Mind you, I didn't know what the deal was. I didn't know what was expected. I said "Okay, you guys, look. Everybody else has signs up, where are my signs?" "Oh, they're coming, they're coming. It's better to wait until late because then they have a more recent effect. It's much more effective to have a whole new bunch of signs go out at the very end because people are already used to seeing everyone else's signs. Yours will be more noticeable." "But Dan, why are there no signs at all?" Well, he was out of town dealing with the Nader thing and it was getting later and later and I was getting more and more frustrated and pissed off. I finally went out and ordered the signs from the printer in Rumford. I looked at what they had and I saw nail files and thought to myself it would be great, everybody uses nail files, especially chicks. Magnets, everybody loves magnets. Put them on your fridge and they're there forever. Plus if you have a metal mailbox you can just slap it on the side. And the pens and stuff that we gave out, *that I gave out*, at every opportunity.

Q. About how many professional signs did you order from the printers?

A. Well, according to, ah, the Sun Journal 250. I don't remember if that is true.

Q. And you put out all of them?

A. Yes.

Q. And the designing on the signs, who produced that?

A. Well, um, Jessica produced it and did it for the one design on the palm cards that we printed on the printers at my house. But then she didn't do anything so I took that in to the printers and told them I needed signs. They did a beautiful job.

Q. Did the campaign make any homemade signs?

A. Yeah, and I wish everyone would stop saying homemade signs. Everybody does that. I thought it was really lame myself, and that it was stupid and embarrassing. Then I saw all the other candidates' signs and their signs were worse than mine. I really am offended at the article in the newspaper making fun of them. Mine were better than most of them.

Q. Did Dan Rogers and Jessica Larlee assist in making the signs?

A. Yeah, he assisted by losing pieces of my paint sprayer and leaving it out in the driveway and then wandering off.

Q. So there was one occasion?

A. When he fiddled around, messed around, didn't do a damn thing and then wandered off losing pieces of my equipment.

Q. Did he make any signs on any other occasions?

A. No.

Q. You mentioned nail files, and I believe you've given us examples of refrigerator magnets and pens which the campaign bought. Who purchased those?

A. I did.

Q. Was that from the Maine Press?

A. If that's the one in Rumford, yeah. They also made the signs, the pretty ones.

Q. Did the campaign purchase any professional printing at all, other than the newsletter?

A. No.

Q. No mailers, no palm cards from a professional printer?

A. From a professional printer, no. We had the all-in-one office machines. They're really cheap and pretty much disposable because it's cheaper to replace than to fill up with ink. So, we had the palm cards printed. We printed lots of those and I chopped them up and handed them out. They came out really nice, you saw them.

Q. And you're referring to the fax printers that were reported in your campaign finance...

A. Yes.

Q. ...and your campaign purchased?

A. Yes.

Q. You're saying the palm cards and the thank you notes were printed on those fax printers?

A. Correct.

Q. Not by a professional printer?

A. Right.

Q. So the campaign, other than the newsletter and the signs, didn't get any professional printing done?

A. Right.

Q. I want to refer you to another expenditure to Mr. Rogers in the amount of \$3,000 on line 20.

A. Dan and Jessica were going to do a series of three newspapers in which I could give my views on a number of issues. Yeah, that's what was supposed to happen all right.

Q. So how did that expenditure come about?

A. They were supposed to have done a series of three newspapers.

Q. And was that supposed to be part of the \$5,000 payment you initially paid them?

A. Well, no, it included the printing of those newspapers which was my understanding. I don't know where the \$3,000 fee came from. Dan said it and I was like "Okay, if that's what it is, that's what it is."

Q. And how many newsletters were ever printed?

A. One. The one there at your elbow.

Q. I would like to introduce this into the record. It will be labeled St. James 13. I recognize we skipped one and will come back to it in a minute. Is that the only newsletter then that the campaign distributed?

A. The one and only.

Q. And who wrote the articles in that newsletter?

A. Jessica wrote some, I wrote one. I'm not sure which one. Jessica pulled together some other stuff, printed off some stuff. She definitely wrote *Why We Shouldn't Re-elect Bruce Bryant*. I love that. See, here's me with Ralph Nader, a real Presidential candidate.

Q. Did Dan Rogers write any of the articles?

A. I don't think he did, he might have; I can't be sure about that. But I don't know that he did.

Q. Was there ever any reason that the campaign would only publish one newsletter?

A. Never. And I was outraged and I complained about it bitterly.

Q. And what did they say?

A. Well, for one thing, one Sunday Jessica called me up; she was all screwed up. She told me that she was all excited. She was writing an article about Jesus was a space alien. And I said, "I don't want to hear about how Jesus was a space alien until you get some of the stuff written for my campaign, which you've already been paid for." I really yelled at her a lot and I said that's not all right. I don't want to hear your crazy ideas. I want to see some action here.

Q. And did Jessica have a response for that?

A. Oh, she just whined a little.

Q. Who arranged to have that printed?

A. Um, well, I guess Dan did. He did do that.

Q. And where did he do that printing?

A. At, ah, the Sun Journal.

Q. And among the invoices there's an invoice from the Sun Press for \$1,575.

A. Yeah, that would be it.

Q. But the check in the bank records is in the amount of \$1,500. Do you know how much was actually spent?

A. Oh, yeah, \$1,500. I had to come up with the extra \$75 after the campaign. So I just paid it out of my own pocket because I got a bill for that later I think. As I recall, there was an extra amount that I just thought to myself, "Screw it, I'll just pay it myself."

Q. When did that newsletter become available to the campaign?

A. On Saturday evening at seven o'clock before the election on Tuesday. Which means it was virtually worthless. And you notice no postage meter; no nothing that could have all been printed on there. Instead, I had to go out and buy stamps, buy labels, try to get

them printed, hire a bunch of yahoos to come up to my house on Halloween and spend the entire night getting as many of these done as possible. Then I had to get out Monday morning to the exact post offices. We had to sort them and get them to the exact post offices in hopes that they would even get there before the election.

Q. Was there ever any plans to use bulk mail or a permit?

A. Apparently not.

Q. Was it ever discussed?

A. Not with me. But then I didn't expect to have it come down to the last moment and I thought they knew what they were doing; even I know you should do that.

Q. And who picked them up on that Saturday?

A. Um, ahhh, my husband.

At this point the director verified that Ms. St. James was positive and not guessing. He further urged her not to guess at any of the questions they were asking her today. She stated she would not.

Q. So it was not Dan Rogers?

A. No, Dan Rogers was missing that day. I never, from days before that, I have never seen Dan Rogers since then, except for the closing ceremony at Hebron Academy last spring. Since days before the election I never laid on him or Jessica.

Q. So your testimony is you received that newsletter on the Saturday, three days, before the election?

A. Yes.

Q. I believe it was October 30<sup>th</sup>?

A. Yes, that's correct.

Q. On your campaign finance report, there's a payment made to Dan Rogers in the amount of \$2,000 and the reported date was October 25<sup>th</sup>. What was that payment for?

A. That was for the mystery phone calls; it didn't happen.

Q. What did he tell you was going to be provided?

A. That the obnoxious phone calls would only leave a message if they get an answering machine. It would hang up if it was a live person. I wrote the check and I said, "Who do I make the check to?" He said to me, "Well, make it to me; you can't very well make it out to the Republican Party can you." Those were his exact words.

Q. I'm a little confused about the reference to the Republican Party.

A. Well, supposedly, the Republican Party had all of the wherewithal to do such a thing as this. And he, I dunno, sounds like one of his sleazy deals that he had some "in" with them that they were going to do it for \$2,000. So just to make the check to him and he was going to make it all happen.



Q. Did he mention what company or firm was going to make the phone calls?

A. No.

Q. Did he mention who this contact was that was going to arrange for the phone calls?

A. No.

Q. And were those phone calls made?

A. Absolutely not.

Q. So you paid \$3,000 to Dan Rogers for three newsletters and you only got one?

A. Right.

Q. You paid him \$2,000 for automated phone calls that never happened?

A. Correct.

Q. Would you say your campaign got good value for the money you paid to Mr. Rogers?

A. Not at all.

Q. I asked you earlier this morning how was it you continued to pay money to Mr. Rogers even though you had frustrations with him about him not providing promised services, and yet, here it is, October 25<sup>th</sup>, you're turning over \$2,000 more dollars to him. I think the Commission members might have a hard time understanding at this point why you would trust him enough to make that payment.

A. Well, maybe I'm naïve, maybe I'm not very bright, or experienced. Or maybe he's just a really good con man. I mean, still if I talk to him, I like him, and I'm absolutely furious. I mean at that point he hasn't done this and this and this. Well, it's like, okay, this is like the last ditch effort. Okay, another \$2,000. Maybe something good is gonna happen. Um, I really believed he was going to make the phone calls. He was really keyed and anything underhanded and sleazy like that he gets really wired about. He was loving that. At a certain point, it's like, well, I'm in this far...I can't very well...what am I gonna do...it's like the 25<sup>th</sup> of October...fire him and start over from scratch? I mean I'm in. I've got to see it through and that was the best thing I could do. Of course, you've got to pick a horse and ride it; that's the one I'm stuck with. And yeah, maybe I am naïve that he was gonna do it. I didn't even know such a thing existed or was possible.

Q. There was a July 19<sup>th</sup> payment to Dan Rogers in the amount of \$872.69. The check, on the little memo section of the check, says "printing." Do you know what that would have been for?

A. No, I don't. What I remember it being for...oh, he told me to write that. It seems like he claimed that he had been doing some work over at Jessica's house. Jessica had been doing some writing. I didn't think to ask, I mean that was fairly early on, so I didn't think to really ask. Although, that was like one of the first red flags. It's like, why am I paying you extra when I have already paid you \$5,000 to run the campaign. And I did bring that up, I forget what he said, it was some...I mean it was early on and I didn't

really think enough to question it further. Um, but he never asked me for that particular sort of expenditure again...where he was telling me an hourly rate, where they worked so many hours, a check for him and a check for Jessica.

Q. Yeah, there was a payment on July 19<sup>th</sup> of \$272.51.

A. Right.

Q. Is that the \$600 amount difference and I was wondering if there was any connection between the two?

A. I have no idea except he told me to write a check to him and to Jessica. I sat down and wrote both checks at my living room table.

Q. What rate did he say he was charging you?

A. I don't remember.

Q. Did he ever give you any invoices for the work he provided?

A. No, never.

Q. Among the documents you gave us was a request to him to provide invoices after we began this audit of your campaign. Did he respond to you?

A. Never.

Q. Because he sent an email to us indicating he'd sent you some invoices by email?

A. No.

Q. Is that possible?

A. That's totally not true.

Q. Okay, turning to Jessica Larlee. Did she keep any records of all the expenditures of the campaign? Even at the beginning?

A. I think early on she probably did.

Q. Do you know what happened to those?

A. No, she was all hot to trot about getting these folders. Everybody had to have a folder and it was just stupid. And she had her little folder and she'd stuff things in there and run around and act important. Then just wander off and not really do anything. Finally, at a certain point, I did manage to get her little folder back with whatever receipts were in it and as far as I know that's all she did. Other than a couple of reports, which apparently had to be corrected.

Q. Well, you have turned over a lot of receipts for the campaign, of expenditures, who kept those?

A. Well, I kept a big pile of them; I had a box and I just sort of tossed them in. At a certain point, I got Rob to take care of it because I do not do paperwork.

Q. In response to our audit, Ms. Larlee submitted a letter to us and I marked it Exhibit #12. I was wondering if we could go through that together. I would like to ask your

response to some particular statements she's made and maybe if you'd let me go through them.

A. Okay.

Q. This is Exhibit #12. She states that you did not provide her the necessary paperwork for her to act as treasurer, is that correct?

A. No. Well, okay, what paperwork is she talking about? I have no idea.

Q. Did she ever ask you for any paperwork?

A. Checkbook.

Q. Did she say to you that she could no longer act as treasurer?

A. *(laughing)* No. No, no, no, no, no.

Q. You're sure?

A. I'm quite sure.

Q. Take it very seriously that when we sent out questionnaires to candidates and treasurers that we get accurate written responses back. She could be in trouble for providing false information.

A. Oh, she absolutely should be, this is a blatant lie.

Q. I want you to be really careful in your responses to me when we go through these, about what she did and didn't do.

A. Yes.

Q. Did she tell you that she could no longer act as treasurer?

A. No.

Q. Do you have any knowledge that she called the Ethics Commission and asked for paperwork to change it?

A. I have no knowledge of it, but I seriously doubt it. If so, then why didn't she do it?

Q. Did you have a verbal agreement with her about two weeks after the bank account was created that you would take care of the campaigns paperwork?

A. I have never agreed to take care of anyone's paperwork including my own personal paperwork. That is absolutely false.

Q. Going back to that \$272 payment. She's stating that it was for her campaign services. Do you have any idea what she is referring to?

A. No clue, except that when, okay, I take that back. The only thing I can say is that when Dan told me to write the check and I said, "Well, what's that for?" "Um, Jessica did some writing for so many hours." What the writing was allegedly, I have no idea.

Q. She states she was paid \$100 per week from Dan Rogers for the duration of the campaign. Do you now if that's true?

A. Well, I have no way of knowing if that's true. Um, what Dan paid her for I can only imagine, since she was worthless for the last several months of the campaign. Why she would be paid for anything I can't imagine.

Q. Was she put in charge for designing an eight-page newsletter? Let me put it differently, did you put her in charge?

A. No.

Q. Do you know whether Dan put her in charge?

A. I do not.

Q. Did the newsletter, which I put in as Exhibit 13, did it require lots of thorough research?

A. No.

Q. Did she write a speech for you when you introduced Ralph Nader?

A. Absolutely not. That is an outrageous lie.

Q. Did you give a speech when you introduced him?

A. Yes, I did.

Q. And who wrote it?

A. Well, I don't need to write a speech. All I needed was a couple of points and then I just get up and talk.

Q. But she did not write a speech for you?

A. Absolutely not, there was no speech. I took care of it myself. All I needed was just a general little list of the points I wanted to cover and I'm really, really comfortable making speeches and getting in front of people. And it was very well received by the way.

Q. Did you put Jessica in charge of assisting you with door-to-door campaigning?

A. No.

Q. Do you know whether Dan did?

A. Well, if, ah, if performance is any indication, I'd say no one did.

Q. Did she do any door-to-door campaigning with you at all?

A. At the very beginning a little bit, yes.

Q. Are you referring to the gathering of the \$5 checks?

A. Yes.

Q. After you qualified for the public funds and you were...?

A. Never, never.

Q. Did you do door-to-door campaigning?

A. Oh yeah, absolutely.

Q. About how many trips would you say you made?

A. Oh, I don't know. It was, you know, an every day thing. It was what I did instead of what I should have been doing in my real life.

Q. Did she take photos of you for literature?

A. She took some, but they were never developed or printed or used. No photographs she ever took was ever used in this campaign.

Q. So where did those photos come from? (*pointing at the newsletter picture*)

A. That came from a party in my greenhouse when Jenna and Jessica were up and we were all having a party and I posed for some good pictures to put up on Cupid.com.

Q. So those were not photos that were....?

A. No, no.

Q. Did the campaign buy a digital camera?

A. Yes.

Q. And what happened to that camera?

A. Jessica stole it.

Q. Was it used for any campaign purpose?

A. No.

Q. Was it used for any of those web things?

A. No. It was never used for anything because she stole it as soon as we got it.

Q. You asked her about it?

A. Yeah. I said, "Where's the camera?" And she said, "Well, I took it home so I could figure out how to use it and someone stole it out of my car." But she lives on a farm in the country, so it's not exactly, like, drive by material.

Q. Jessica said she painted some big signs, is that true?

A. No.

Q. Did she paint any signs?

A. No.

Q. How sure are you of that?

A. Well, it all happened in my driveway and I was the one out there, so I'm sure.

Q. Is it your testimony is that she never painted any signs?

A. Yes.

Q. Did she keep a list of your supporters?

A. Absolutely not.

Q. Is there anything else about her services, or lack of services, that you want to tell the commission about?

A. Sure. You'd probably like to know why I fired her.

Q. Yes, please go into that.

A. Okay. Well, Jessica got progressively stranger as the campaign continued. Um, at one point she started wearing her hair in dreadlocks and I told her to get them out. I didn't want to be represented that way. That I wasn't trying to appeal to a bunch of want-to-be hippie kids who want to smoke dope. I wanted to appeal to people who pay their taxes and live their life and live a respectable life and not be represented by someone who looks like they crawled out of a dumpster. I told her to take them out and she wouldn't do it. She got weirder and weirder, she was doing a lot of drugs, picking up a lot of men and I had to tell her to stop bringing them to my house. Then one weekend, and my fourteen year old daughter was there and she was privileged to hear all these messages that Jessica left. Ah, Dan was at my house and Jessica was, um, really banged up on methadone that she had gotten from someone and she was just wild. She was sure that Dan and I were having an affair and she started calling up leaving threatening, insulting messages that got more and more hysterical. She was going to trash his apartment starting with the piano that he'd had since childhood. She was going to kick my ass if I didn't bring him down there right away and on and on. It was just so insane and so horrible that I kept the messages as long as I could, but at that time I had one of those answering phones where you have to listen to all the past messages to get to your current messages. And they were so insulting, saying get your fat ass out of bed, and all of that, that I just couldn't stand it; I had to delete them. It was just so insulting and humiliating to have that on my phone. My daughter got to hear it all; Dan got to hear it all. She called every forty-five minutes that Saturday night and I said, "That's it." Under no circumstances do I want to have anything to do with this person.

Q. And when was that?

A. Ah, it was a Saturday night, ah.

Q. Getting back to the newsletters. Was there a plan on how you were going to get them out to the voters?

A. Um, well, I guess that kind of comes back to the Republican mailing list.

Q. Why don't you go into detail?

A. Okay, you mean the fake date? Okay, alright. Well, Jessica phoned me up and said, "Get ready. You're going out on a date." I'm, like...first of all, I was seeing someone at the time, and "No." "Yeah, you're going out on a date, it's a safe date, you're going out with Stavros Mendros." Why would I do this? "Well, if you go out on a date with him and he gets to be seen with you, it's going to make his ex-girlfriend jealous and he'll give us the Republican voter list." And, I mean, it sounded stupid, but it's, like, well, I'll go out and have a drink with the guy; he can make his friends happy or jealous or whatever. I don't care. And he was a very nice guy, a perfect gentleman, and a really nice person. So we went out, and you know he's Greek obviously, we went to several of his relative's

parties and then we ended up at this club, where we had to be presented out and a big spectacle was made. We had to dance and it was really weird. But he was a nice guy and it was fun; it was a good time and all of that, and we did in fact get the voter list. And what else? That was one way these were going to be distributed, um, I don't what else they had planned. Um, there was supposed to have been a series of three of them. Um, I don't think they had a really good plan.

Q. As we began the audit of your campaign you provided us with a large stack of mailing labels and data. I would like to introduce into the record Exhibit #14 which is ten pages. Do you know where the names and addresses for the list came from?

A. Yup, RNC voter vault; that sounds like the Republican National Committee to me. Um, these were probably by, I believe Dan.

Q. Who on your campaign received the names and the addresses?

A. I don't understand the question.

Q. Who, of the various people you've mentioned who were involved in your campaign, who among those people received those names and addresses?

A. Like the stack that I gave you?

Q. Yeah.

A. I did, I don't know whether Dan and Jessica had a copy or not.

Q. Do you know whether the campaign received them in paper form or electronically?

A. I do not. I know that I received them in paper form. And that at a certain point, close to the end, when we were...I mean, because this, this is all well and good, but you can't put this on this. (*Pointing from labels to newsletters*) So what we needed was to be able to print these on labels. And I don't remember the technical stuff about it. I know that Rob tried to get onto the site. Dan, for some reason, had the password to the site and I don't remember what it was, but I remember it was something very funky.

Q. Do you know whether Rob Campbell ended up downloading the data from the website?

A. I'm trying to remember whether he did or Fire Moon, ah, someone did. It was either he or John Crowhurst.

Q. Is that the person you refer to as Fire Moon?

A. Yes.

Q. And, who's he?

A. He's a friend of mine that I've know on-line for about seven or eight years. And he lives in England and he is a computer guy. And he, well, he's a computer guy, but he was downsized and so he had to take a job at a factory making fire retardant panels. Which is apparently a very hideous job and business was slow at that time of year and he said he wanted to come over and help for the campaign. And so he was, like...there's a group of people that have been friends for years on-line. When anybody has a computer question, they call John. And so, he had something to do with that and worked with

trying to get the computer to work and get the labels printed and all of that. That's one of those things that's like, scribble, scribble, "I don't know; you do it." I don't remember the details of it.

Q. So, both John Crowhurst and Robert Campbell tried to download this list?

A. Yes.

Q. Do you know whether either of them were successful?

A. We did print labels, so someone was.

Q. Do you know...you mentioned the date with Stavros Mendros?

A. Yes.

Q. Do you know if he actually supplied the names and addresses for the campaign?

A. I didn't see him do it. So I can't really say anything more than I went on a date and we got the mailing list.

Q. Did Dan mention anyone else associated with the Republican Committee?

A. No.

Q. Do you know whether the data included voters from your district only, or were there voters statewide?

A. I do not know.

Q. Do you know whether Dan Rogers had that database for any other purpose?

A. I don't know.

Q. You mentioned a couple of times that Dan Rogers promised that you were going to get services through the Republicans in connection with these mailing labels and in connection with the automated telephone calls. Were there any other goods or resources or services that were provided to your campaign from the Republican Party?

A. Not that I know of. In other words I don't know, there could have been, but not that I know of.

Q. Did you have a sense of whether Dan was being honest when he said he was going to arrange for these telephone calls by the Republican Party? Is there anything that would lead you to believe that was true?

A. I truly don't know. I believed it at the time. I wasn't happy about it because it really is obnoxious and rude. But he did say it was very effective and that the Republicans have the best system, the best mailing lists and all of that. And so, as far as I know he intended to, but I have no way of knowing what his intent was.

Q. Do you believe that Dan Rogers was authorized to provide you with this data from the Republican Party?

A. That was not the feeling I got.

Q. What?



A. Just the fact that when I asked who to write the check to he said, "Well, you can't very well write it to the Republicans can you. It's the Republican Party, you can't write a check to the Republican Party." So that gave me the feeling that this was some kind of under the table sort of deal.

Q. Under the table from the public or under the table from the source of this data?

A. I don't know.

Q. Who assisted you in putting the labels on the newsletters?

A. Oh, gosh. Yeah, we talked about this. It was a situation where I had several people that were there to help and it was pretty much hysteria. This was on Halloween, Sunday night, and the final push. It was like anybody that had the wherewithal to stick a label on and a stamp on, or to hand out newspapers. Where I live, there's Hartford and Canton, there's a group of people that are generally referred to as the Canton Chronicles. They are just kind of kids, who don't have much of a future at present unfortunately, and they're usually hanging around down at the corner. And it was, like, I knew several people, and I said, "I need people, who do you know, bring them. Bring them to work, bring their girlfriend, bring their brother. I don't care. I need people who will just do this now." I mean it was either that, or this wouldn't have even gone out at all. It was just down to the wire and, ah, we did that. And then we worked all night on Sunday, Monday. A bunch of people got out, John and I and I'm not sure who, got out and drove as many of them to the various post offices as we could. And then we rounded up more warm bodies and went out and just put them on carbon shields, parking lots, in stores, people's houses and we went to Mexico, Dixfield, Rumford, Jay and literally went door-to-door putting them in people's hands. Anywhere we possibly could.

Q. And did the campaign pay these people.

A. Yes.

Q. How much?

A. Well I guess that's part of the \$4,500 we were talking about. See, when I took that out....

Q. Can I just note for the record that there's a withdrawal of \$4,500 in cash on, I'm not sure of the date, but it was right before the election.

A. Yeah. Well, okay, I have a checking account, but I don't write checks. I am not very good at that stuff. I can build things, I can cut down trees, I can fly an airplane, but I can't do this. And so when it comes to checking accounts I don't write checks. I use a debit card and I pay cash because I don't want to screw up and get in trouble and have charges and people get mad at me and I'm really embarrassed about that so I never try and write checks so they won't bounce. So it's just much easier for me to just get cash and pay these guys. Plus, you gotta realize that these are people who don't have checking accounts.

Q. How much did you pay each one of them?

A. I think it was like \$50 a day.

Q. One thing the staff is still trying to get a handle on, and we haven't yet, is how that \$4,500 in cash was spent. And let me just go over statements of what we've gotten from you so far in our interviews. You've mentioned that some of these individuals who put on labels included John Crowhurst?

A. Yes.

Q. Arthur Murray?

A. Yes.

Q. Someone named Jason or Justin, which I wonder if his name is just Justin York? Does that ring a bell?

A. No, there was a Jason and Justin as I recall.

Q. So that's four people?

A. Uh huh.

Q. And you're saying that you paid them \$50 a day in labor?

A. Yeah.

Q. So that's an awful lot of people to add up to \$4,500.

A. Well, there were an awful lot of people there.

Q. How many would you estimate, say on that Sunday?

A. I know that there were fifteen to twenty at any given point. I mean, plus it was Halloween and these guys, you know, they wanted to party, too. So they would kind of come and go and there were easily fifteen to twenty people at my house at any given time.

Q. Did you provide them with any refreshments?

A. Yes, we ordered pizza and sodas and, oh, some people brought beer and wine, whatever. I mean, I had to feed them.

Q. So you're estimating fifteen to twenty people on Sunday?

A. Yes.

Q. What about Monday, the day before the election?

A. Oh, gosh. Well, I know I dropped off probably like five or six people. Okay, we had Dixfield and Mexico and Jay. And I know that there were at least six people in the jeep. I got stopped and did not get a ticket because I was running for office and the election was the next day. It could have been fifteen to twenty people at various times.

Q. Here's the problem. The election law, not just for Maine Clean Election candidates, requires the payee reports the date and amount for every expenditure. That's \$4,500 in cash and if we take you at your word, that there was fifteen to twenty people, and you paid them \$50 and bought them food and soda, it still doesn't add up to anywhere near \$4,500....

A. But they didn't work just one day either. And, wait a minute, what was I going to say? Um, I dunno, go ahead and I'll think of it.

Q. Well, I know you're trying hard to provide us with the answers, but if there is anything else you want to tell us about in the future....

A. What I was going to say was, okay, that may be what the law says, but I hadn't seen Jessica and Dan for probably a week before the election. So at that point I was just flying

blind, trying to get as much done as I possibly could and figured we'd figure out the rules afterwards.

Q. Um, let me come up with a couple of expenditures here and tell me whether they came from \$4,500 in cash.

A. Okay.

Q. There was an invoice by John Crowhurst for \$500, but there was no check written out to him. Are you certain that the campaign paid Mr. Crowhurst \$500, and if so how did you pay him?

A. I think that probably did come out of that, 'cuz that was right around the same time period.

Q. But you're not sure?

A. Not 100 percent.

Q. Are you sure that the campaign paid him for his services?

A. Yes.

Q. And you're sure the amount was \$500?

A. As sure as I can be, yeah.

Q. And in our interview you mentioned somebody by the name of Randy Hammond. Could you go into what he provided to the campaign and how much you paid him?

A. I don't remember the details, I think whatever is written down is what it would be. Um, he, ah, he's a good friend and pretty much would do anything I needed him to do, whether it was going to pick up lumber and stuff for the signs, deliver stuff, ah, I don't remember what all.

Q. You've never given us a figure in writing. Orally, you said it was about \$700. Does that seem right to you?

A. Probably. I mean I don't want to say yes or no and not be specific, but if that's what you say, then I think it's probably right.

Q. Your campaign reported payments to Robert Campbell, four different payments, \$200 and \$500, and those were confirmed by checks that we got from the bank. But the campaign also reported a payment of \$1,000 to Mr. Campbell and \$120. Do you know how you made...first of all, did you make those payments?

A. If it says I did, I would say that I probably did. I really don't have a clear memory of it.

Q. Did that come out of the \$4,500 in cash?

A. Possibly, yeah.

Q. Do you believe that all of that \$4,500 in cash was spent on campaign related issues?

A. Absolutely.

Q. Did you spend every penny of that \$4,500?

A. Hmm, probably so and probably more if you count money that I ended up throwing in of my own on whatever occasion.

Q. Did you use any amount of that \$4,500 for any personal expenses?

A. No. Now I know that there was like \$10 or \$11 worth of seeds from the lumber yard that the kid rang up with the stuff I bought that was mine. And some question about so-called driving gloves. Why they were called driving gloves on the receipt I have no idea. There are just leather gloves and had I not been coming from the hospital I would have brought them with me. I didn't buy any personal stuff with that.

Q. So did you say that you had made a large purchase of postage from the post office?

A. The, ah, largest purchase ever in Lewiston/Auburn postage history.

Q. Do you know how much?

A. \$8,000.

Q. Your report says \$8,066. Is that right?

A. Yes.

Q. How do you go about buying \$8,066 worth of stamps?

A. With great difficulty. I went to one post office and another and told them what I needed. It took a while, and they had to pool their resources because, ah...what is the postage on this....is it 49 cents, something like that? Right around that, and so some of them...we tried to get as many stamps as possible as the actual amount. As many of the kinds that you don't have to lick as possible, and then whatever we could get close, if it was 50 cents or whatever. After that, whatever they had that we would have to piece together to make it come up to the right amount.

Q. And of that amount of stamps, what portion would you say you used, for campaign purposes?

A. You would know better than me from what I gave back to you.

Q. As we proceeded with the audit you initially gave us what we counted as \$991.98 in stamps. That was in our first interview.

A. Okay. Okay.

Q. In our second interview, I inquired more about the stamps and then you provided us with an additional \$3,585.80 worth of stamps.

A. Well, I wouldn't even have known that except that you had mentioned the voter list. And that was underneath of my daughter's bed, in a bag and the stamps were in the back.

Q. So, were you aware that you had this large amount of stamps left?

A. No, I would have brought them to you the first time.

Q. You're saying that you didn't even know that you had \$3,500 worth of stamps?

A. Nope.

Q. How is it that you didn't know that?

A. There's a lot of things I don't know! I don't know, they were in there, I certainly wasn't keeping track of how many stamps we used and you know, at that point...plus, by the time the election happened, um, I had been running on sheer nerves for so long that afterwards I had to go into the hospital then for dehydration and exhaustion and just being really, really sick. So at that point, I was just shut down. It was like everything that was left I just put away or got literally swept under the bed and I didn't pay that much attention to it. It's just not something I would pay attention to.

Q. There's one exhibit I want to ask you about which you explained was an accounting that Robert Campbell had done. That's Exhibit #11.

A. Okay.

Q. There's a line on there, there are few lines of some cash withdrawals that the campaign had made, and then a number of lines which I'm taking to understand to be payments that the campaign made for gas.

A. Right

Q. Do you know how Robert Campbell compiled this?

A. No, I don't.

Q. Do you know what he based it on?

A. No.

Q. Did you keep receipts for all these purchases because they weren't among the ones that you had provided to us?

A. Really?! Well, I always tried to keep receipts of everything.

Q. Did you turn them over to Robert Campbell at some point for him to prepare all of these expenses?

A. Yeah. I mean, okay, I said I don't do paperwork. I *really* do not do paperwork. Since I'm getting divorced I have forced myself to open my mail. Um, any of this, any receipts, the way I would handle it, was just to put them in a pile on my counter or in a box and then get someone else to take care of it.

Q. What I see here is four withdrawals totaling \$1,727.50 and expenditures for gas and other materials, but the expenditures only add up to \$608.

A. Wait a minute, how can that be? When one of them is \$598?

Q. I mean, I think that that's not a specific purchase; I think that's an estimate.

A. Okay, well, I'm sure you're right.

Q. Was the campaign careful to make sure that the Maine Clean Election Act funds were spent only for campaign purposes and not for your personal stuff?

A. Oh, I would never, never! First of all, I don't drive unless absolutely necessary. I don't go anywhere and the only time I went anywhere, pretty much, had to do with the campaign. No, no, you can call me a lot of things; you can call me a weed farmer, but you can't call me a thief.

Q. I'm not calling you a thief.

A. No, no, I know. I'm just saying I would not do that, that's not the kind of person I am.

Q. Part of the Commission's mandate is that it is suppose to verify that all of the money paid to you in MCEA funds was spent on campaign stuff.

A. Right.

Q. So the Commission has a rule that says, "Campaigns can reimburse candidates for money that they spent on fuel, but they are supposed to keep accurate records." They are actually supposed to keep a record of the date and the trip and the campaign purpose and the number of miles. Now perhaps a lot of candidates don't keep all of the required records, but it is our job to verify.

A. No, you have my absolute solemn word. I never used the money just to put gas in my car. If anything, quite the opposite. I spent a ton of money of my own...well, everything I had.

Q. Can you provide the Commission with an estimate of how much of your personal funds you think you might have contributed to this campaign?

A. Oh, just off the top of my head, like maybe a couple thousand dollars.

Q. In addition to the public funds you received?

A. Yeah. I mean part of that was before the public funds were received. And okay, that may or may not be applicable or whatever, but it took every cent I had.

Q. What did you spend that \$2,000 on?

A. A lot of gas for one thing, running around, doing all of this stuff from the beginning. And, jeez, I mean I had people at my house staying there all the time. I fed them, I gave them clothes, I washed their laundry, I did all this stuff and that's not money, but I mean. I'm...what?

Q. Well, we're curious, what people are you talking about?

A. Oh, people all the time. Dan, Jessica, Jessica's daughter, her brother, a bunch of guys she would drag home, I mean there were people at my house all the time. I'd come down...I mean people she would pick up at bars. There'd be people on my couch and I would come down in the morning and not even know who was there and who had stolen my car the night before. I mean there was, like, a revolving door on my house.

Q. What electronic equipment did the campaign purchase?

A. Okay, there were the two little cheap all-in-one office machines, the big printer, the laptop, the digital camera.

Q. What did you do with the equipment in December of 2004 and January, February of 2005 after the election?

A. Well, the printers just sat around in my living room. I never used them once. The laptop, um, I goofed around on it 'cuz it was a little faster than my laptop. I had some games on it, like ink ball that my kids play, but that was...that was it.

Q. So you did use the computer for some personal purposes?

A. Yeah, a little bit. Well, I could put pictures on there, or...I wish I had known, I could have been able to burn cds and now I can't, but I didn't even use it for that.

Q. Did you know you were under an obligation to sell the equipment and then return the proceeds to the Commission?

A. I knew that you had to either do that or give it back. And I thought, you know, I would just give it back.

Q. Well, we didn't get it from you until after we wrote you an audit letter, which I believe was in April...

A. Hmm hmm.

Q. How come we didn't get it from you until then?

A. I don't know, I never got around to it. Believe me, I wanted it out of my living room. One of the office machines leaked ink and made a big stain on my tile floor. I mean it wasn't doing me any good; I wasn't getting any benefit out of it that's for sure.

Q. Was there one digital camera purchased?

A. Yes.

Q. Was there a second one purchased?

A. Um, John gave me one for a present, which I have still not figured out how to use.

Q. How long before the election did you last see Dan Rogers and Jessica Larlee?

A. Ah, I don't have a really clear memory. I'm gonna say it was at least a week, ah, probably a good bit longer for Dan. He, um, just disappeared into Nader-land and pretty much abandoned my campaign for Ralph Nader.

Q. What was the last thing that Dan Rogers did for your campaign?

A. Ah, tell Rob the password to get the voter list from the Republican website.

Q. What was the last thing before that, I mean that was a small thing. I'm trying to get a sense of how much he did put in for you in the last couple of weeks before the election.

A. Okay, well, um, well I suppose the last thing would have been getting the newspaper printed.

Q. And he would have dropped that off sometime before you actually received it, is that right?

A. Yes.

Q. Any idea when he dropped that off?

A. Couldn't have been very long; it was just days. It was probably like the Thursday before the election or there about.

Q. What was the last thing Jessica Larlee did for your campaign?

A. Hmm, well, it's hard to say because, you know, she had that big psycho incident and was banned from the house and I wanted nothing to do with her....or her family. Um, and then she called and apologized and, ah, she may have done something, but I don't remember what it was.

Q. Do you have any idea at all when that occurred, when she blew up at you?

A. Oh...well the kids weren't in school yet I'm sure. So, that would put it before September...um...probably August. Let's see if I'm right. I don't think it would have been July, so it probably sometime in August.

Q. So after that happened did she do anything for the campaign?

A. I really don't have a clear timeline in my mind as to when she finally got any of this stuff done in the paper. Or, I mean she really didn't do much of anything other than that. So, when she did it and when it actually got taken to the printer and got printed. I don't have, like, a clear mind of that.

Q. Do you remember when that date was with Stavros Mendros?

A. Well, it was summertime, so I would say probably July. Okay, now there's a way to verify that. Um, not at this moment, but the night of that so-called date...okay. They came up and insisted that we all go out together. Dan and Jessica came up. I had my daughter, Star, with me, Dan's daughter, Rachel, and Jessica's daughter, Angela, were all there. Ah, Jessica's brother Brett and I went to a bar called the Cage, which is in Lewiston, 'cuz I didn't know where it was. And he's not old enough to go in, but he helped me find it. And I met Stavros at the Cage. Now, during that, when we were out having our little date, Dan and Jessica took all the kids to a carnival that was over at, like, the old Wal-Mart building in Auburn and they were walking around and it just so happened that some cops were there and recognized Dan. That he had some outstanding warrants. And so they took him into custody and put him in jail that night and Jessica doesn't have a drivers license so she had to drive home illegally, but it was only, like, you know, a quarter of a mile she had to drive back. Because Dan got taken to jail that night. So if you would find out when that night was then that's when the date was.

Q. When you paid the \$2,000 for the automated phone calls, you paid them before the recording was made. Is that right?

A. Yes.

Q. Did that strike you as odd?

A. Not nearly as odd as when I asked Dan about it and he goes, "Don't worry; it's in the can." And I'm, like, how can it be in the can? I haven't recorded anything. How can this be? And he goes, "Don't worry; it's under control."



Q. Who was authorized to make purchases for the campaign?

A. Well, I guess me and ah, you know, if they were going to buy something they just told me and I gave them the money.

Q. So by "they", you're including Dan and Jessica?

A. Dan and Jessica, yes.

Q. Was there anyone else that was authorized to make purchases for the campaign?

A. No, not specifically as far as I can really remember. If somebody needed something, I don't know who it would be, but say if Rob were preparing the reports and needed something I'm sure I would...but that's speculation. I don't remember anybody making any purchases. I certainly didn't overtly authorize anybody to go spending money.

Q. Going back in time to when you opened that bank account with the initial check from the Maine Clean Election Funds, you mentioned that you withdrew \$100 in cash.

A. Uh huh.

Q. Was that the only withdrawal of cash you made that day?

A. Yes, it's all that they would allow and so I was really happy about it. What I didn't know was how desperate Dan was 'cuz his electricity was turned off then.

Q. So you gave \$100 to Dan Rogers?

A. I gave him \$60 and I kept \$40 'cuz I had used all of my money up. And I figured we'd sort it out after the check cleared and figure it out.

Q. Are you aware of any funds that you turned over to Dan Rogers or Jessica Larlee that you know were not spent for campaign related purposes?

A. Well, for sure, the \$2,000 for phone calls...um...I could speculate there are others, but I don't have anything definite that I could say.

Q. I told you earlier that we would go into some of the personal circumstances you had and stuff, including your head injury that you believe impacted on how this all unfolded.

A. Sure.

Q. And I really don't want you to go into anything that you feel is too personal.

A. Oh, no, no, not at all.

Q. Why don't we start with the head injury?

A. Okay. Ah, yeah. November 8<sup>th</sup>, I fell down the stairs in my house.

Q. What year?

A. Of 2003...yeah, 2003. I know it was November 8<sup>th</sup> because Jessica's cousin Jenna was having a baby shower on the 9<sup>th</sup> and I was invited and I sent a shrimp platter and a high chair. And I didn't get to go because I fell down the stairs in my house. It's a small house and the main floor is ceramic tile and I lost consciousness at the top of the stairs and fell straight down...and if you all want to see the scar.... It's not very pretty and I didn't realize at the time how gross it was and while I was campaigning I went around showing everybody, "Look at my head. This is why I'm running because I'm so glad to be alive." Um, I fell down the stairs and really, really, nearly died. Um, I had a severe concussion, a collapsed lung...ah, had two transfusions and had to be life-flighted to

CMMC. And, that's why I didn't get to go to the baby shower. After that, I, ah, it's hard to even understand or explain what it's like unless you have had a really severe concussion. And...I told Jonathan about this movie called "Fifty First Dates," I don't know if you all have seen it, but it's about a girl who has a car accident and a more severe injury than mine even. And part of it they go through this hospital where there are people with head injuries and it's fascinating to me 'cuz, ah, it was very much like my experience. In the weeks afterward, the first few weeks, it was like I was wrapped in gauze. And I would just walk around my house, looking for the telephone. I'd find it and lose it and it wouldn't occur to me that I could hit the page button and find it. And that's just an example of what it was like. I just walked through life in a strange kind of euphoric state and I had a number of holes in my memory. I lost a lot of both short and long term memory. For example, I was talking to my sister on the phone and she said back when Danny died, and I was, like, "Danny died?! What are you talking about?!" And I had no memory that a year and a half prior my cousin had died. And I had to, like, go through the whole grieving thing all over again. Um, a few days after my fall, one of the, um, EMTs phoned my house and she asked for me and I was like, "Yeah." And she was, "Not only are you out of the hospital, but you're alive?" She said, "We've been checking the obituaries because we didn't think you were going to survive." I mean, they don't give you the helicopter ride for fun. I really, really almost died. And, since then, my memory has gotten a lot better, but even now, even as recently as a few months ago, my marriage/divorce counselor was recommending that I see a neurologist because he could see that there were still a lot of holes in my memory. Even now, there are strange things like, ah, my boyfriend. I'm at his house in Bethel and try to use the phone and he goes, "No you have to dial 1, 207." And I'm, like, "Really, that's so unusual." And he goes, "Julia, we've had this exact conversation three times before." I mean people are not always very kind. But there was...it affects you in a lot of strange ways. For example, notebooks; I have notebooks and notebooks and notebooks because if I don't write it down.... And so, yeah, I would say things got by me, but maybe I would have been a little tougher about.... But I was kind of in this euphoric state for a long time, where I'm alive, everything's happy. And maybe I was more trusting. I mean I certainly had red flags and warning bells, and I did ask questions and occasionally got upset about it. And, I'm not saying that the head injury made me, like, stupid and helpless, and hopeless and whatever, irresponsible. But it did change me. It definitely did.

Q. I don't mean to interrupt because I know there are some other personal things that you might want to get into, but there are a couple of substantive things that we want to make sure to ask you about before...

A. Sure.

Q. The initial check for \$16, 791 from the Ethics Commission, do you know how it is that it went to Jessica or Dan?

A. No, actually when you think of it, I was kind of surprised that it went to her instead of me.

Q. Did they ever talk to you about being set up as a vendor with the state government in order to receive these checks?

A. No.

Q. Doesn't ring a bell?

A. Not at all.

Q. There's a form, which I don't have with me now, that's called a "new vendor form," which is how new candidates get set up. Do you remember seeing that?

A. No, I don't. Why? Did I sign it?

Q. Ah, I don't have it in front of me, so I couldn't tell you. I'm just trying to determine...that's what determines where the initial check of public funds goes to and I'm wondering whether that was a choice of yours or not?

A. Oh, okay. No, certainly not a choice that I had made; it may have been something that I was handed and told to sign.

Q. Okay, thank you very much.

At this point the director turned the questioning over to Phyllis Gardiner.

Q. Just before we wrap up today, Ms. St. James, we wanted to ask you about another document that I think you provided. It's marked as St. James Exhibit #16. Do you recognize that?

A. Yeah, it's the HOMO-MIM flyer.

Q. And where did...how did you...is that the same document that you provided to the Commission staff?

A. Yes, it is.

Q. And how did that document come into your possession?

A. Jessica handed it to me at her mother's house.

Q. And do you recall when that was?

A. The date? No, it was during the summer; I would guess probably July.

Q. And what did she tell you about it?

A. Well, she and Dan had made reference to HOMO-MIM a number of times and, at first, I didn't know what the heck they were talking about. And then finally, again the head injury thing and HOMO-MIM. I thought they were mispronouncing a homonym or something. I didn't know. So, rather than look stupid I kind of waited to see if it became obvious. And eventually they told me about it, that ah, they had put this together. I think they were working for Dorothy Lafortune and they thought it was hilarious. In a way, it is hilarious, except it's not hilarious; it's not fair. And that they had put this together, that this fake coalition for homosexual marriage in Maine, which doesn't exist, as a smear tactic against Stephen Beaudette. They sent out a 100 or a 150 of these to people that knew him and that would report back so he hears all these people going, "What? You're for gay marriage? What's up with that?" sort of deal. And he thought the whole district

got it, when, out of their pocket, they just spent a little bit of money to make it look that way.

Q. Did Jessica tell you how much they spent?

A. No.

Q. Did she tell you how many they had distributed?

A. I could be wrong, but this may be the one they sent to Florida and had mailed back from Florida. I could be wrong about that. Just I do know that it went out in the mail.

Q. And you recall that they told you about some mailing that they took to Florida to mail?

A. Yes, yes, whether it was this or something else I don't know.

Q. Um, do you recall what campaign it was in connection with? The one from Florida?

A. My guess is Dorothy Lafortune, but I really don't remember the specifics because it seemed like a bunch of political gobbledygook to me at the time.

Q. Did they tell you, did Dan or Jessica, tell you they made up the Coalition for Homosexual Marriage in Maine?

A. Yes.

Q. Did they tell you whether anyone else was involved in preparing that?

A. They never mentioned anyone; they claimed that they did it specifically.

Q. Have you had any discussions with anybody else about that mailing?

A. Yeah, a few people.

Q. Anyone that had any knowledge of the distribution of the literature?

A. Oh, no, no, just people that I said, you know, this is what happened, you know, and I had turned it over to Jonathan. As far as like any actual serious political discussions with anybody who has anything to do with anything, no.

Q. Do you know how they printed the flyers? Did they tell you that?

A. No, I don't know.

Q. But Jessica definitely told you that she and Dan were both involved in it?

A. Yes. Yep, yep.

Q. Did Jessica mention whether Dorothy Lafortune was aware of the literature?

A. No, no, actually she never...I don't know that she was. That never came up and this is just my observation, but this was just a little project of Dan and Jessica's.

At this point the director asked Ms. St. James if she wanted to go into any more personal circumstances that they had talked about, the deaths in the family, etc.

A. Oh sure, sure. Okay, yeah, um, let's see. I fell down the stairs and nearly died. I was simultaneously starting a business. I built a greenhouse. Then I was arrested on two Class B felonies, and that was about the time a friend had given me money to go visit my grandmother before she died because I had spent all my money. So I didn't get to go see her before she died and then that was April. In August, my mom died. And then the divorce from hell that never ends has been going on through all of that and all of the ugliness of that. And, ah, my soon-to-be ex has subsequently taken my kids and moved them seventy-five miles away from me has broken all of the court orders and agreements. He's stolen a lot of money from me that was supposed to come to me from the sale of the house in Hebron that he was appropriated. He opened eleven credit cards in my name without my knowledge. Ultimately charged them up and then left them dangling, so he's trashed my credit. Um, then, let's see, my dad died in July. Any other tragedies Jonathan...? It's been a tough couple of years.

Director. Thank you very much for all of that. I thought you might want to have an opportunity to explain how that all contributed to what went on in your campaign?

A. Well, yeah. Um, the arrest of course was kind of the catalyst from me running. Um, you know there's just so much that you can have happen and be on top of anything. Last week, I found a journal that I had written in last October and part of it said I had just gotten free kittens for my daughter for her birthday. I decided to let them take them to their father's house 'cuz in case I went to jail it would be better. That's the kind of axe that I lived with over my head for well over a year. Losing everyone, because of the arrest and the fact that the person who, ah, the informant, the anonymous informant, was Jessica's cousin, Jenna, daughter of my former best friend because she was jealous of my friendship with her mom. Kind of a twisted individual, so she set out to kind of destroy my life and have me arrested. Went to the trouble of emailing my soon-to-be ex telling him what a lousy mother I was and making up a lot of stuff; went to the trouble of calling up DSS and explaining to *them* what a lousy mother I was. Which is not true. And so, consequently when I had to tell her mother that Jenna had done this, there was, "Oh no, not my daughter, not Jenna, not her; she wouldn't do that." Well, she did do it and it's been confirmed to me privately by someone in the police department. We'll leave it at that. But because of that I pretty much lost all of my friends with a very few exceptions of people who stuck by me. So I lost my family and my friends, divorced, with a head injury, didn't know whether I was gonna go to jail. And so sure probably I didn't make the best decisions sometimes, probably I should have been more on top of a lot of things.

It was decided that Ms. St. James would stay until after Ms. Larlee's testimony.

Chair Ginn Marvin stated that the Commission members wanted to take a little more time questioning Ms. St. James and then they would convene for lunch and then Mr. Campbell would testify.

Mr. Ketterer took the floor and thanked Ms. St. James for her attempt to give the Commission a candid testimony. He went on to say that they realized that she'd been

here for a number of hours and that it had been an emotional time for her and they appreciated her responses and her cooperation. He did have a couple of questions for her.

Q. You had said earlier in your testimony that you were a serious candidate and you gave us a lot of information that would tend to support that conclusion, and that you wanted to be a voice for the decriminalization of marijuana, but you made the statement, something about, "I spent so much time on the campaign, I was doing this"...I guess meaning campaigning..."rather than what I should have been doing rather than my regular work." Is that what you were referring to?

A. Well, I mean I was trying to get a business up and running. I just built a greenhouse and I should have been cutting fire wood. I should have been clearing my land. I should have been cleaning out the ditches so that my road's passable in the winter. I should have been working on my house. That's what I mean.

Q. Um, in light of the fact that the political campaign does kind of have a tendency to take over somebody's life, it sounds like to some extent that it high-jacked your life. In light of that, was it certainly possible that, you know, where you weren't doing your other work and you weren't generating other income that, you know, if you went to the food store and had to buy \$40 worth of stuff, soup, or tuna fish or bread or something like that, that you may have used cash from the campaign to do that? I mean you had all these people staying in your house.

A. Never.

Q. Never?

A. Never.

Q. So what was the relevance then of having all these people in your house if you didn't spend campaign money to feed them?

A. Well, I dunno, I don't understand your question...what was the relevance of having them there...

Q. Yeah, what is the relevance of that? The testimony I thought had to do with increased expenses that you had because you had all these people in your home.

A. I don't think I said that.

Q. Okay, well, whatever you said is a matter of record, but if I misunderstood that then that's something we can check. Okay, now, you mentioned when one of the campaign workers or campaign manager needed money, he might press you for money you said, at least from my recollection of your testimony anyway, is that you knew his electricity had been turned off or he had gotten a shut off notice regarding his electricity. Would that be the type of thing that would in your mind trigger perhaps writing a check to him because of the mess that he found himself in by the electricity?

A. No, not at all, I didn't know he was out of the electricity until afterwards. Ah, I forget what exactly the situation was, but then it came out why he was so desperate was because his power had been turned off. And I'm like, "Jeez why didn't you say something? You could at least taken a shower at my place." I mean, no, not at all.

Q. You didn't feel pressured by him to write a check then unless he deserved it based on the work that he produced for your campaign?

A. Correct.

Q. That's your sworn testimony?

A. It absolutely is.

Q. You're absolutely sure about that point?

A. Yes.

Q. Okay, thank you, I have no further questions.

Mr. Cassidy questioned the witness.

Q. I have a question, since you qualified and received, you know, Clean Elections campaign money, why would you spend \$2,000 of your own money, but yet give these other folks so much money?

A. I'm just making an estimate there. I know I spent whatever money I had in the bank when I started was gone and whatever money trickled in from my husband, gone. I mean, that is not a hard and fast figure at all.

Q. But you returned \$13,000.

A. Yeah.

Q. Why wouldn't you put bills in for the \$2,000 that you had spent of your own money?

A. Well, doesn't seem right.

Next, Mr. Bigos questioned the witness and stated that he was going to talk about the flyer that was involved down in Southern Maine, the HOMO-MIM organization.

Q. Do you know if Dan and Jessica represented to you that they were paid to produce that, from anybody or anyone?

A. They did not say that they were paid to produce it.

Q. So you don't know one way or the other whether they did receive compensation?

A. I do not know.

Q. Do you know how the mail postage and printing was paid for?

A. No, I don't.

Q. What other campaigns are you aware that Jessica or Dan worked on before yours?

A. Before mine...I'm having a hard time coming up with an answer for that as of before. Um, they talked about a lot. I don't remember; nothing that I can be specific and correct.

Q. Are you aware that they worked on any legislative campaigns before yours?

A. Yes, and it would take me a while to figure out and remember what they are. I know, I mean, they sounded legit. They had other things that they had done; they knew people; they introduced me to people that are "for real" people.

Q. And did you have a sense that they have an approximate number of how many legislative campaigns they may have worked on before?

A. Oh, I don't know.

Q. Just one or ten or a hundred?

A. I'd say between one and ten would be just my....

Q. And do you know for how long they may have been in the campaign business, whether ten years...?

A. Well, Dan apparently has been at it for quite a while. I mean he seems to know everything and everybody and....

Q. So estimate how long you think he's been in it.

A. Oh, I couldn't, that would be just sheer speculation.

Q. More than two years?

A. I would say so.

Q. When did you determine or decide that you were going to run as a publicly financed candidate in relation to when you just decided to be a candidate?

A. I can't really separate the two because I didn't know the difference at the time. I didn't know anything.

Q. So it's possible you decided to be a publicly financed candidate at the same exact time as you decided to run for office generally?

A. I didn't know that there was such a thing as a publicly funded candidate. I mean this all had to be explained to me, how it worked. I had no idea; I had never heard of Clean Election funds at all.

Q. How far after you decided to run for State Senate did you realize that you were going to become a publicly funded one?

A. I don't know. It was just...you know, I really knew absolutely nothing about any of this. And as Dan and Jessica, I mean they just kind of took over and started doing stuff and they seemed to know what was going on. So, hey, that's great. And I had, you know, confidence in them and then I started getting a little bit of a, you know, bad vibe about certain things and I tried to check it out. I really didn't know enough to even separate the two issues.

Q. I really appreciate you trying to jog your memory as best you can. Can you give me a sense as to whether you thought that was days that you learned that you were becoming a public finance or perhaps was it weeks or was it more in terms of a month or more?

A. Well, it probably took a few weeks for...I mean they may have told me several times before it actually sunk in.

Q. Thanks very much.

Chair Ginn Marvin questioned the witness and stated she just had a couple of questions.

Q. The campaign funds, did you use those to buy the pens and the nail files and so forth that you had talked about?

A. Yes.



Q. So how did you do that? Did you write a check?

A. Yes.

Q. You wrote a check for that?

A. I did write a check, yes.

Q. And does Jonathan have a copy of that check, is that in...?

A. I'm sure he does.

Q. And, Jessica and Dan, were they a company? Or were they a couple?

A. They were a couple.

Q. They were a couple?

A. It was a very, very volatile, tumultuous relationship.

Q. And then part way, they were no longer a couple?

A. Well, ah, Jessica was always free-ranging, shall we say.

Q. Okay. And today, they are a couple or no?

A. Apparently not.

Q. And when this all started you were married, or you had already filed for divorce?

A. Ah, yeah, the divorce has been going on for about three years.

Q. I'm curious about more information about this Republican voter list, too, about how that worked. I just really don't understand how your going out on a date with Stavros Mendros led to your getting a Republican voter list.

A. I don't get it either!

Q. Okay.

A. I mean I don't. I just figured okay they say go out and have a drink with the guy and we're gonna get this voter list. Oh, okay, I would have had a drink with him anyway, so what's the big deal. And how that all worked – it was, like, the black box, not my department.

Q. So you don't know how....

A. No. No, and I'm not at all pointing a finger at Stavros as anything improper or anything. I don't know. This is only what they told me.

Q. And you don't know of any other Republican person that possibly gave you the list?

A. No.

Q. Or anything like that?

A. No.

At this time Chair Ginn Marvin thanked Ms. St. James for going before the Commission. She stated that she knew it must have been a difficult thing to do and to work through. She cautioned Ms. St. James not to discuss her testimony with any of the other witnesses. Ms. St. James responded that there was no chance of her talking to any of them.

Chair Ginn Marvin suggested to the director that he move for the admission of the evidence into their records.

The director moved to have the evidence and exhibits moved into the Commission's record. No vote was necessary. Ms. Gardiner stated that she thought it would be better to admit the St. James exhibits by number into the record. At this point, the director and counsel conferred to verify which exhibits had been introduced. The director moved that St. James Exhibits 1 through and including 14 and St. James Exhibit 16 be made a part of the record.

A recess was called for lunch. The Commission would reconvene at twelve thirty.

The Commission introduced themselves to Mr. Campbell. Robert Bruce Campbell was called to the witness stand and sworn in by Chair Ginn Marvin.

Q. Do you swear or affirm that the testimony you are about to give will be the truth, the whole truth, and nothing but the truth so help you God?

A. Yes.

Testimony of Robert Bruce Campbell.

Counsel Gardiner started the questioning.

Q. Would you just state your full name for the record?

A. Robert Bruce Campbell, Jr.

Q. Where do you reside?

A. I live at 7 Just-a-Mere Road in Falmouth Maine

Q. How long have you lived there sir?

A. Ah, two and a half months.

Q. And where did you live before that?

A. 538 Buckfield Road in Hebron, Maine.

Q. How long did you live in Hebron?

A. Um, a year and nine months, almost two years.

Q. Where were you living during the last six months of 2004?

A. Um, last six months of 2004....

Q. During the election campaign.

A. Would be Hebron.

Q. And you're currently married to Julia St. James, correct?

A. Yep, yep.

Q. I believe you have been separated for some time?

A. Yes, we have been since November.

Q. And were you residing in the same location during this campaign in 2004 or not?

A. With Julia?

Q. Yes.

A. No.

Q. Can you briefly just describe the nature of your involvement in Julia St. James' campaign for the Senate of 2004, just quick overview of the nature of the activities you were involved in?

A. The first thing, my first participation, was signing a petition and giving her a \$5 contribution. Um....

Q. Do you recall when that was?

A. No. Ah, her and Jessica came to my house in Hebron and knocked on the door, like I guess they were doing everybody in the neighborhood. And, ah, asked for the \$5 contribution and at first I wasn't going to and then they talked me into it.

Q. What were, can you just give us the details of the other activities that you were involved in?

A. Yeah, um, at some point and, I don't have exact dates in my head, but at some point Julia called. We had a conversation on the phone where she had mentioned she had had a falling out with Jessica and, perhaps Dan, although I don't think Dan was part of that falling out. Um....

Q. And when you say Jessica and Dan, can you just tell us the full names?

A. Ah, Jessica Larlee and Dan Rogers. Although at the time I thought it was Larbee. And....

Q. You had indicated that Julia St. James had told you that she had had a falling out?

A. Oh, right, her and Jessica had a falling out. Jessica had left some phone messages on her voicemail, which I actually did hear, and were, for lack of a better word, pretty insane. Um, and at that, I think a couple of days after that, so she decided she didn't want to be treasurer anymore and she had a report filing coming up and I think I helped her with her report. First time, I became involved, directly.

Q. I'm going to show you...we've marked the documents with exhibit numbers, just so it's clear which documents are which. I'm going to show you what we've marked as St. James, Exhibits 4B, 5A, 5B, and 6; if you could look at those. Do you recognize them?

A. Yes. Yes.

Q. They are all four campaign finance reports filed with the Commission, correct?

A. Yes.

Q. And did you play a role in preparing those reports?

A. Yes. Um, this one....

Q. You say this one, if you could just say the exhibit number.

A. 4B, um, was a revision of one that had been done by Ms. Larlee I believe. There was a \$1,000 check that was excluded. Yep, from the original filing and this was a correction that I came across when I was doing it. Um, 5A; is this the same one?

Q. Which ones are you looking at?

A. 5B and 5A?

Q. I believe the dates on the cover pages are different. One is an amendment.

A. Oh, one I had to amend because of the \$2,000. There was a \$1,000 problem here, and then I had to correct it.

Q. But you did prepare both 5A & 5B?

A. Yes.

Q. And did you also prepare 6?

A. Yes.

Q. Let me also show you...well, keep these as I will be referring to them as I ask questions. What we compiled for Exhibit 7, St. James 7, first page is an excerpt from one of the same reports you looked at; but the remaining pages are in spreadsheet formats?

A. Yes.

Q. Are those all spreadsheets that you prepared?

A. Yes they are.

Q. Okay, and you included them in campaign finance reports?

A. Yes.

Q. What are the sources of information that you used to prepare these reports?

A. Um, the source document used as a basis was her checking account, the Senate checking account, and each line item on these reports that I prepared corresponds to a line item on the checking record. Um, for the explanations, I either got an explanation for the notations on the checks or I asked Julia what they were for, um, if there was no notation on the check. Um, and if it was for Dan, I called him one time, and it was, I can't remember the amount, I think it was a \$4,000 check and he told me to split it between consulting and advertising or something like that. There was one for Jessica that I never did get an answer on; it was like a hundred and something. Anything that was Dan or Jessica I never got an answer on actually. Other than when Dan told me to split it between the two, I had no other basis to go on other than his word.

Q. If you would look, probably the easiest exhibit would be 7, past the first page at the spreadsheet. You mentioned this first one, which is the amended 42-day post-primary, you said you did that amendment because of what, a \$1,000...?

A. Yes. When we went through the checking account there was a \$1,000 that was not accounted for in the original one filed by Jessica Larlee.

Q. And how did you learn of that \$1,000?

A. The checking account; when I was trying to match the numbers they weren't....

Q. Now the \$100 cash item on the first line of that; is that something you added, correct?

A. Maybe. I don't remember.

Q. Exhibit 4A, which you referred to as the original 42-day post-primary report.

A. Okay, yeah, I guess it was.

Q. Do you know why you added that?

A. The same reason...from the checking record; it wasn't on the report.

Q. Okay. Also, I'm going to show you St. James Exhibit 8 which is a copy of the bank records the Commission obtained with Ms. St. James' permission from the bank.

A. Yes.

Q. Um, we were unable to find the \$100 cash.

A. Um, that would appear because it came out of the deposit from the initial contribution, I believe.

Q. Okay, so it came out before that?

A. I think so; I believe.

Q. Okay.

Q. And what was the basis for your description of the purpose of the \$1,000 cash payment; which is listed here as "gas/misc?"

A. That's what I was given for an explanation because Julia had no credit cards for travel and what not.

Q. So you got that information from her?

A. *(nods)*

Q. If you would turn to the next page of the Exhibit 7, that page and the page after that are both part of Exhibit 5A correct?

A. *(nods)*

Q. If you look at the later one, the amended one again, the first listing of cash for \$500 and it indicates in the remarks column "gas and out of pocket travel advance."

A. Uh huh.

Q. Do you know what the basis was for listing it and describing it that way?

A. It was the same as what I was told initially.

Q. Okay, on the third and forth lines there, there are payments to Jessica Larbee, now you know it's Larlee, and Dan Rogers in the amount of \$272.51 and \$872.51. One says "for advertising" and the other says "printing/postage;" do you know why you allocated it in that fashion?

A. Um, I don't recall that conversation. My answer would be that either I was told by Julia or Dan, but I don't recall for sure.

Q. Do you know what those expenses were actually for?

A. I have no idea.

Q. Okay. On the...half way down the page there's an item for cash, \$300, and in the remarks column it says "first month rent/campaign HQ." I assume that's headquarters?

A. Yes.

Q. Do you see that one?

A. Yes.

Q. Where did you get the...what was the basis for your describing it that way?

A. Um, that's what Julia told me that was; for the first months rent for the, ah, campaign headquarters.

Q. Do you know where the campaign headquarters was?

A. In, um, Wilton.

Q. Whereabouts?

A. Ah, about twenty, twenty-five minutes north of her house.

Q. No, I'm sorry, I don't mean where in Wilton; I mean where *in* Wilton?

A. Oh, ah, downtown, I can't remember the address. It's, ah, near a Chinese restaurant across the street; I don't recall the address.

Q. If you would...

A. It's on Main Street.

Q. ...turn to the bank records, in Exhibit 8 while you have both of them out, you can look at them side by side. Um, and if you would look at that \$300 check for cash on the 23<sup>rd</sup> of August.

A. Uh huh.

Q. The list on the report is cash \$300, do you see a canceled check there for that amount?

A. Yes.

Q. What's the note written on that check?

A. Oh, it says "travel expenses."

Q. Do you have any idea...and who signed that check?

A. Julia.

Q. Do you have any idea why she would have written travel expense on there and told you later it was for rent?

A. No, no, I didn't pick that up.

Q. There's another check for cash, probably in that same page of the bank statement on the 27<sup>th</sup> of August for a \$127.50, which you listed here on the report for travel expenses as well; did you get that information from a conversation with Julia; the note on the check says "supplies?"

A. Oh, um, it would have been later on, I guess.

Q. Did you have the canceled checks when you did these reports?

A. I had, um...I don't remember if I had all the canceled checks. I know I had the statements and I might have had some canceled checks, but I don't recall if I had all of them. But I definitely had the statements.

Q. You mentioned earlier that you used the notes on the checks sometimes to indicate to you what the checks were for.

A. Yes.

Q. Ah, were there any occasions in which you noticed a discrepancy between what the note was on the check and what Julia was telling you?

A. Not that I noticed. I mean, there are a couple maybe, but I didn't notice anything.

Q. On the same page that we were looking at, on the second page of Exhibit 7, Dan Rogers payment \$3,000 on September 20<sup>th</sup> and in the first version of this report you didn't have anything in the remarks column and the second version of the report you wrote "newsletter production." Do you know why you added that?

A. Yeah, because that's what I was told it was for.

Q. Who told you?

A. Dan. Because I had to call him with...before we got the, ah, public flyers that were produced...I guess he was supposed to deliver them to Julia. And she called me one Friday or Saturday and she called me up and said no one was picking them up and could I help her. So I, ah, went to pick them up and had questions for Dan about where to get them and things, so I called him and I may have asked him about the check at this time. I can't remember. It probably was him, but I couldn't swear to it. It could have been Julia. As far as I know, it was for the flyers that were being produced.

Q. You refer to flyer, marked St. James 13, is that the one?

A. Yes.

Q. And you picked that up at the printers?

A. No, I picked that up outside somewhere; they were on pallets. I didn't pick all of them up. I only took some of them and I guess Dan picked the rest up.

Q. Do you recall when that was?

A. Ah, it was, I think, on the Saturday before the election or a Friday or something; close to the election. They were...there was very little time between when the election happened and when these things were produced.

Q. If you'd turn please to the next page of Exhibit 7; which I believe is a spreadsheet you prepared for the 42-post general election report. Is that, do you recognize it?

A. Yep.

Q. On the first line, there's a cash payment for \$750 and in the remarks column you wrote "literature and drop services."

A. Yeah, that's what Julia told me and, um, my understanding was...I think she told me something about it at one point and I don't remember what it was; probably just a few months ago, too.

Q. You have a canceled check in the upper left hand column of Exhibit 8 on that page, for \$750, a check for \$750 on that page, correct?

A. Uh huh.

Q. And in the note it says financial services.

A. Uh huh.

Q. Do you know what that refers to?

A. No.

Q. How about the next check on that same page of the bank statement?

A. \$600?

Q. \$600 check for cash also, right?

A. Yep. Yep.

Q. And you listed that on the report as being "October/November rent for campaign headquarters?"

A. Right, that's what Julia told me.

Q. And what does it say on the canceled check in the note?

A. It looks like "Lit Drop Labor."

Q. "Lit drop labor?"

A. Yeah.

Q. Do you have any idea of what the explanation is for that discrepancy?

A. Um, no.

Q. You actually helped move her out of the campaign headquarters. Is that right?

A. Yes.

Q. And there's a listing on the same page of the campaign finance report you're looking at; a check to you, or a payment rather, of \$120.

A. Right.

Q. That was for the moving?

A. Right.

Q. And a couple of lines above that, it looks as if there were several campaign workers hired for \$500 to remove signs, clean up and pack up headquarters?

A. Well, the only thing I can say about that, is that there was one other guy helping us pack up headquarters; I don't remember his name. I couldn't pick him up out a line up if you asked me to. Um, the sign removal and clean up and stuff; I don't know who that would have been to. There were signs all over the county.



Q. Who did...on December 2<sup>nd</sup>, the day you actually got paid for moving campaign headquarters was the day you did the work?

A. Yep, yeah.

Q. Do you have any idea why the packing up happened several weeks earlier than that; I mean, do you know why there was a delay in getting out of campaign headquarters?

A. Well, I think the rent was paid until November and....

Q. Let me show you another exhibit marked as St. James Exhibit 10, which is a set of receipts that were provided to the Commission by Ms. St. James and a few pages into that I think you will find four receipts that you...that are invoices, I'm sorry, not receipts. Is that correct?

A. Yep.

Q. When did you prepare the invoices?

A. Ah, November 29<sup>th</sup>, for all of them or most of them.

Q. The first two are dated the 29<sup>th</sup>?

A. Yeah.

Q. Did you print them on that date?

A. Well no, I printed them on the days after because 10/29 was right before the election. I was getting ready for the weekend and they needed me to do something, putting labels on these. The labels only had towns and zip codes, no names, so we ended up writing in the names. When she asked me to help with that I said, "I want to get paid for the other things first."

Q. And ah, what arrangement did you make with the candidate; what you would get?

A. Um, whatever we talked about.

Q. Well, maybe you can explain to me. The first two invoices here are yours.

A. Yes.

Q. They are both dated 10/29. The first one says "sign placement and maintenance in Hebron 9/04-11/04." I take it that was to maintain lawn signs or...?

A. Yep.

Q. And you said 4 days at \$50/day is \$200. The second receipt, I'm sorry invoice, same date, same description, sign maintenance in Hebron 9/04-11/04.

A. Yeah, that's this....

Q. 33 1/3 hours at \$15 an hour.

A. Yeah, that's the one for sign placement maintenance, this one (*indicating the first invoice*) I probably just forgot to change the description. I was using the same template. That would have been for the, ah, putting stickers on the mailing and stuff.

Q. The \$200 one?

A. Yeah.

Q. So you're saying you just copied them?

A. Yeah, I just didn't change the description.

Q. So what did you actually do for that \$200?

A. Um, a lot more than \$200 worth I'll tell you that. Um, I probably spent about twenty hours all together between picking up these things and labeling them and, um, stamping them and, ah, writing out the addresses for the people's names. I didn't take them to the post office, but at that point I didn't want to charge anymore because she was running low on campaign money. That's what she told me.

Q. Okay. How did you keep track of your time spent on the sign maintenance and placement?

A. Um, it was basically, like, a half hour a day from however long a period of time. I can't remember off the top of my head.

Q. What did you do; did you actually drive around and look at the signs?

A. Um, good deal of them, probably 75%, were on my property, but there were a lot of them. I mean, I lived on a state road, I mean a state highway, so people would knock them down and they'd get pushed over so I would have to replace them or fix them up so they would look better. Um, there were a few around the immediate area that I would have to attend to; so it wasn't a lot of driving.

Q. Um, the payments, the third invoice in that group; dated 11/8 for a \$1,000 and that was for preparing the campaign finance reports?

A. Yeah.

Q. And was that what you both agreed that you should be paid \$200 a report?

A. Um, I think I told her I would charge her a \$1,000 for all the reporting and that included helping her figure out how much to send back.

Q. Um, do you recall how you were paid that \$1,000?

A. Um, the \$1,000? I think I was paid in cash. I think that's the only one I received that was cash.

Q. Do you know what the source of that cash was; in terms of can you relate that cash in what you reported?

A. Um...well, I couldn't relate it to any other line item, no.

Q. I'm sorry, not to the line item on the report; could you relate it to any particular cash withdrawals on the bank statement?

A. Oh, no. Oh, wait a minute, yeah, a \$1,000 extra cash I think. Yeah, I think so. Yes, I think I do see cash.

Q. Do you see a check for a \$1,000 in cash; I don't see it?

A. No.

Q. There's a check made out to cash on December 2<sup>nd</sup> for \$120, for labor; that's your labor for moving campaign headquarters.

A. Yes.

Q. And on the next page there are two checks to you, one for \$500 and one for \$200, those are written to you.

A. Right.

Q. I didn't find anything for the \$1,000.

A. No, I'm kind of confused about that right now, too.

Q. You don't see it either?

A. No.

Q. Okay.

Q. If I could turn your attention to an invoice for the campaign, Exhibit #10; an invoice from SunPress in the upper left-hand corner?

A. Uh huh.

Q. Have you seen this invoice before?

A. Yes.

Q. Do you know when you saw it?

A. Yeah, when I got a bag of receipts and I was trying to...this is when the inquiry came in for her, um....

Q. Which inquiry; the inquiry from the Ethics Commission?

A. Yeah.

Q. So that would mean this inquiry?

A. Yeah. And I do remember seeing it then though and I just told her that because it was one of the ones over \$50.

Q. And this receipt is dated on the 31<sup>st</sup> of October 2004; which would have been in the reporting period for the last report you prepared, correct?

A. Yes.

Q. It doesn't appear to us to be listed on that?

A. No, I didn't have it at the time of the report.

Q. Okay. Did you...looking back at the canceled checks, I believe on the same page as the checks written to you, page 8; there's a check written to Sun Journal for \$1500.

A. Oh, Sun Journal or Sun Printing? Sun Printing.

Q. If that was on the bank statement do you know why it wasn't in the report?

A. No, I don't unless I made a mistake somewhere. Hmm...well, she could have paid cash for it I guess; although it was a check.

Q. Do you recall seeing the receipt when she gave you a bag of receipts. She gave you a bag of receipts sometime in the summer of 2005?

A. Yeah, yes. Yeah, would have been...May, June, July...around that time, right after the request for information came in.

Q. From the Ethics Commission?

A. Yeah.

Q. Okay. If you would turn to...I'm sorry, in the receipt exhibit, underneath the bank statements, if you could flip another page, there's an invoice from a John Crowhurst?

A. Yeah.

Q. Do you see that?

A. Yeah.

Q. Have you seen that invoice before?

A. Yes.

Q. And when did you first see that?

A. That was forwarded to me through email when we were putting together the responses for the Ethics inquiry. There's probably a stamp on it, on the email.

Q. From whom did you receive it by email?

A. Um, from Julia, forwarded from John.

Q. John Crowhurst?

A. Yeah.

Q. So this was an invoice you did not have in your possession when you were doing the first election campaign expenditures?

A. No, no. No.

Q. And we didn't see a canceled check for it or a line item in the bank statements either; do you remember those documents?

A. Hmm, no, not that I recall.

Q. Um...did you discuss this particular expenditure with Julia St. James?

A. Yeah, and my understanding was she had paid him in cash and that was part of the \$4,500 check that she'd written for cash. That's what I recall discussing with her.

Q. When did she tell you that?

A. Um, same time frame; whenever the inquiry came in and I was helping put together the responses.

Q. When you were preparing the post election campaign finance report for her, did you ask her about any cash?

A. Yeah, yeah.

Q. Did she mention any payments to John Crowhurst at that time?

A. I think, yeah, I do recall her saying something about it. Um, she told me that when she took him to the airport she gave him cash and I assumed it was for that, although I guess it could have been for something else. Um, we didn't talk specifically about his payment for any services.

Q. If she told you that she'd actually paid him some of the \$4,500 in cash at that time, why didn't you list that on the report?

A. Because the report was prepared six months earlier.

Q. So you're talking about a conversation you had with her *not* at the time of the elections?

A. Right.

Q. It was this summer?

A. Right, when the inquiry came in.

Q. Okay, then perhaps my question was unclear. I want to move you back to the time period, November, December 2004 when you were preparing campaign finance reports for her. Um, and you had listed cash, \$4,500.

A. Uh huh.

Q. Did you ask her what that cash was used for?

A. Yes, and I was told it was used for...basically trying to paraphrase...handing out \$100 to people to distribute literature. She seemed very, almost manic, about getting all these things out and finding as many people as she could find to get them out. That's all I knew about it.

Q. So at that point she hadn't mentioned anything about John Crowhurst being paid?

A. No, although I will say it was a very hectic time as I recall; things were moving very fast.

Q. Sorry to have to pass a lot of papers to you; another document which is labeled St. James Exhibit 11. Do you recognize that?

A. Yes.

Q. Is that something you prepared?

A. Um, this is for...this was a work in progress so this is not a completed work product.

Q. But is it something you actually prepared?

A. Yes, yes.

Q. And do you recall when you prepared it?

A. After the inquiry came in, I got a bag of receipts and I took the...I printed these reports off the internet. Um, I didn't have the copies anymore. And I had the request letter and a bag of receipts so I just went day by day until I had used the travel expense amount and had taken out at least three descriptions. Granted maybe one or two are wrong. And then I would just whittle it down if I had receipts like for gas or things of

that nature and then came up with, you know, the 6/22-7/15 estimate \$520.99; that's the gap, the unexplained gap.

Q. So if we add all the items listed on Exhibit 11, explanation of receipts then I think we hit a number of like \$608. But, in any event, the other two numbers you have listed here; \$598.36 and \$520.99 were without receipts?

A. Were without receipts, yeah.

Q. Okay. Ah, you wrote "gas" next to various gas expenses on those two lines; um, what's your basis for believing it to be gas expenses?

A. Um...most of these were either gas stations or places that had gas stations, convenience stores.

Q. The ones you hadn't seen were that?

A. Yeah, they had gallons of, or they said x gallons of whatever.

Q. So why did you write "gas" next to the \$520 plus items for which you had no receipts?

A. Oh, that was just my guess. But again, this is not an official document for me. I mean, this is a work in progress. When I'm filling this thing out, this is a note to myself. There's \$520.99 that's unaccounted for here; I'm saying maybe its gas. But at that point, it's nickels and dimes.

Q. Do you have any way to, in fact, to know whether that \$1,100 in cash, what it was spent for or whether it was spent on campaign purposes?

A. No, I don't have any way of knowing that.

Q. The campaign finance reports that you did prepare, the four reports, you did not actually sign those, correct?

A. Correct.

Q. Was there a reason for that?

A. Yes.

Q. And what was that reason?

A. That once I saw the condition of things, there was, excuse my language, there was no way in hell I was going to sign as treasurer. Um, there were too many unexplained, un-receipted things and I was very uncomfortable with the expenditures to Dan in particular. And I didn't feel that...although I could prepare reports and explain to Julia where the points of exposure were from an audit standpoint, as an auditor looking at it I would say red flag, red flag, red flag. I wasn't positive enough that everything in there was exactly accurate as far as, you know, it was what I was told, but I didn't have enough evidence to...enough empirical evidence to validate what was necessary. And so, I took the approach of my old profession which was to use the best available source of documentation; which was the checks.

Q. And what profession was that?

A. Um, fund accounting, mutual fund accounting.

Q. Um, did you have any questions...any reasons to question the validity of what you were told either by Ms. St. James or anyone else about the purpose of the expenditures that you listed on these reports?

A. Um, not at first. Ah, I had, you know, uneasiness about some things...um...she had mentioned something at one point that she was, you know, didn't have receipts and she kind of spent some of the money, maybe a couple of thousand dollars. That bothered me. I started to look at ways that, well let's see, maybe they reimbursed by mileage instead of gas receipts or look into that. Um, ultimately, um, I just basically, you know, had to say I can take checks if you don't have back up for all this stuff. I gave her the \$1,000 she had gave me for the reports and suggested she put it back into the campaign fund.

Q. Exhibit St. James 9. Is that a document that you prepared?

A. Yes. Um, well, yes and no. Um, I created them, the detailed descriptions in there and from emails that Julia sent me. I don't know the time; I'm going to say that was in June. October 2000, that was an email from Julia. Same with \$272.51 and you can see where Dan told me...that's Dan told her, Julia.

Q. So you prepared this again in response to the Commission's audit letter?

A. Yeah, 'cuz the process was that she got the letter and called me up. And I don't know what she said, but she does not like paperwork of any kind. So I told her I would set up the templates and go through the letter and say, "These are the things you need to respond to." And said, "You need to fill in the blanks; you need to say, okay, where, what did you get this for, where did you get this, where is the receipt." And so she wrote an email about what Dan and Jessica did for her in the campaign and I cut and pasted those emails into this, um, Microsoft Word document/table. Really my goal was to create an easy sort of fill-in the blank form for her to look at.

Q. Um...coming back to just prior before the election; you mentioned you assisted in putting mailing labels on the newsletter?

A. Yep.

Q. Did you assist in distributing that newsletter?

A. Um, not in specific, no, I mailed...but took them to the post office as part of the distribution, but I didn't take them around anywhere, no.

Q. Were you involved in, um, efforts to get hold of the mailing list that would be used for this mailing?

A. Yeah, yeah I was. Um....

Q. Can you tell us what you did?

A. Yeah, I'm trying to remember what happened. The election was on the 2<sup>nd</sup> so this was probably in the four days preceding that, sometime in that time. Um...the um...I'm sorry, I'm on medication for an anxiety disorder and I just lost my track of thought.

Q. That's okay.

A. What was your question again?

Q. That's fine. I'll repeat anything you need me to repeat. What did you do to actually try to get a mailing list for the newsletter?

A. Oh right, okay. Um...we had...they had...Julia had been provided with, um...or she had gotten a bunch of mailing labels and a printer that was supposedly going to print labels up. And Dan said he had the mailing list electronically and that John Crowhurst was gonna take and manipulate and print up the labels so that we'd be able to stick them on these very easily. What ended up happening was that, um, Dan never came up with the mailing list early enough; the labels didn't get created early enough. Um...when Dan finally did come up with a mailing list, somehow he got it. He, ah, I think it was a Sunday, but I can't say for sure. I could probably get phone records and look at exactly what date it was because I have only talked to Dan, like, two or three times on the phone. Um...but I called him and said, "Dan, we got four days; we need this." Julia said we can't get it, to call Dan and try to lean on him a little bit. I said, "All right, I'll do that." And he said, "Well, I don't have it; you have to go into this website." So I went into the website and I needed a password and a log-on ID, even that I had to sign up for it, and pay \$1,000, two to three thousand dollars for a mailing list. So I called Dan back and said, "Dan, these things cost thousands of dollars and I don't even think Julia has that much money left in her account. Um...what are we supposed to do?" So he said, "Let me call you back." And he called back and gave me a password and log-on user id. And I didn't think I would be able to come up with a name, but I went back in my old emails and found an old email that was something Mead.

Q. Mead?

A. Mead. Um...and I don't remember the password but, Mead was in the user name. I think it was TMead or...I don't recall, but it was in there. And so then, I went in. In retrospect, I probably shouldn't have used someone else's password, but Dan assured me he got it with permission. Um, and I downloaded the mailing list I needed to. But the problem was that John Crowhurst was never able to get them fully printed. All he could get was the town, zip codes, and not the names. Um...so we had to print off the list of people from each town and then write in their names. And that's what took so long with those.

Q. Backing up a moment. What was...who was it that told you that you needed a pass code or password that you would...the campaign would have to pay two or three thousand dollars for the information?

A. The website told me that.

Q. The website told you that?

A. Yes. It says there's a charge; it charges for information. I can't remember the name of the site, but it's not free.

Q. Does the name RNC Voter Vault ring any bells?

A. Yes. That's what it was.

Q. Okay.

A. Multiple choices, I did better in it than...what do you call....

Q. Um...did Dan Rogers explain to you how he received the password and ID?



A. He said, ah, he said his Republican friend. That's all. I have my suspicions, but I don't...I wouldn't know for sure anybody.

Q. I'm going to show you, this has been marked as St. James Exhibit 14.

A. Yeah, okay.

Q. Do you recognize this? Is that the list you downloaded?

A. Yeah. Well, yeah, there was that much.

Q. You just copied it?

A. Yep, yep.

Q. Let me also show you these other documents marked as St. James Exhibit 15. It's a print out of a computer screen on the Voter Vault; do you recognize it? Something you recall seeing before?

A. Um, I don't recall seeing it, um... (*mumbling, not audible*)...um...well, I guess I am in violation of the agreement....

Q. Do you remember when you accessed this RNC Voter Vault website? Do you remember something coming up on a screen asking you whether you would accept or decline?

A. No, because all I did for that was I went in and tested to see if the information was obtainable and then I sent Julia an email that went to John Crowhurst, and he actually did sit down and look at it. So I might not have seen that actually.

Q. Do you recall providing the ID?

A. Yes, I definitely used her ID. I went in and validated that the data was there and that there were download options in there. And then I either called or emailed Julia. I emailed her the passwords and then I called and I probably talked to John. But I don't remember...the reasoning is that I probably would have talked to John because he was working with the computer stuff. And told them what the user ID and stuff was and where the download section was; but from there I just let them go with it. I was very disappointed that we didn't get the names on the mailing labels.

Q. To your knowledge did the campaign ever include anything in the reports about the value of these lists that were obtained?

A. No, I would assume that the value to be would be what the charge was on the website. That's the monetary value.

Q. That would be the two or three thousand dollars?

A. If that's what it was. I really don't remember the exact number. I know it was a number big enough to make me flinch though. Um, the value you...to someone, like, off the street, zero. The value to a candidate, priceless.

Q. Did you have...you mentioned that you might have spoken with her on the phone. I think you mentioned that, but did you have any contact with Jessica Larlee during the campaign?

A. Um, the only times I met Julia...Jessica was the time they came collecting fivers and she was the one that talked me into...there was one issue about the state's funding local communities with their share of the education money was a very big issue to me. And that actually got me to sign the form and give the \$5; and that was the only time I actually met Jessica. Until...I remember...Hebron Academy one day, where my daughter was attending and Dan's daughter also attends there. His wife's a teacher there. Um, so I saw Jessica in the car next to me and I waved to her and then she introduced me to Dan in the parking lot. And that was the only two times I saw Jessica.

Q. Was that during the campaign?

A. Um, that was pretty close to after the fivers were collected so I don't even know if the campaign was officially in swing yet. It was during school year so that would have been May...so, no, it wouldn't have been...couldn't have been. It would have been in May or June.

Q. And other than that passing encounter at Hebron and the couple of phone calls you had, did you have any other contact with Dan Rogers?

A. No....oh, except for the phone contact. But other than that, no.

Q. Did you ever see any work product that either Dan Rogers or Jessica Larlee gave to the campaign? Going back to the newsletter again as an Exhibit 13.

A. Yep, yep.

Q. Do you know what else they did for the campaign?

A. Um, my understanding was that, and you know, Julia called me pretty early on when she first got her Clean Election money and then said, "Dan wants \$5,000. Does that sound right to you?" And I'm, like, how do I know?! I don't know what a campaign manager gets. I said if he's gonna provide value, sounds like a fair number. He seemed to have a lot of credentials and everything. I didn't know anything about him at first and then Julia explained to me that he used to be a significant person in the Democratic Party and that he had some political connections outside of the state. And so it seemed to me to be a reasonable request, but I said, "It's up to you, you know, but you need a campaign manager and you don't know anything." And, so probably it was bad advice, but it didn't seem like an exorbitant amount of money to me.

Q. Do you know what he did for that money?

A. I think he did give her some information. I think he did coach her and teach her something. I can't say what they were for sure, probably having to do with the political process and how it works. I think that he introduced her to people, um; I know that Julia was photographed with Ralph Nader and that was a huge thing for her. 'Cuz, in terms of her connection to the campaign, that's when I saw her as taking it a lot more seriously. And I think Dan introduced her into that sort of thing and I don't know if that's got monetary value or not, but it was all sorts of things like this. Other than that, um, it was that and then I was also told by, um, Julia that Dan was gonna do something with Republicans and to do some kind of phone campaign with their phone system. Um, because she had no clue. So I don't think that thing ever happened; I probably would

have been called and I don't know anybody that got calls. So I don't think that phone campaign ever went off.

Q. You mentioned earlier that you were somewhat uncomfortable with the payments to Dan Rogers and so forth?

A. Uh huh.

Q. What was the nature of your discomfort?

A. There was so much. Um, once I did the last report I added it up and looked at he had gotten around \$13,000. And then I went in and looked at other people's reports....

Q. On the website?

A. Yeah.

Q. The Ethics Commission website?

A. Yeah. And I saw that nobody got anywhere near that and so I had probably been paid too much for my reporting too, which my lawyer also told me that...he does some reporting too...at the time I didn't know though. Um, so, you know, that's it. I just thought it was a lot of money. I didn't know what he did for it. I mean \$13,000 was a flyer that wasn't even really for Julia; it's the Fourth Branch newsletter. Um, with her on the front page, but you know. I think the purpose was for her, but I think there was other purposes for him, too. It said Fourth Branch Newsletter at the top and that bugged me even when I saw it. It should have said St. James for Senate newsletter or something like that. Um, it also made me question if he actually used Julia's money to even produce that. I don't still have any evidence that any of Julia's money was used to produce this. I mean, he could have used somebody else's money to make this and put her on the cover for all I know. But, um, so, yeah, it made me uncomfortable; it made me suspicious. Just the way the suspicion along the way made me suspicious because she had been...a number of times and I can't say how many, she had called me and said, you know, "These guys, that it seems like all they are after is money or they had taken off for weeks and I can't get a hold of them." Ah, I remember her mentioning to me that when she first deposited the check at the bank, the first check, that they were clamoring for it and that they were angry. Jessica was angry that Julia wouldn't give her signing authority. I remember having that conversation with Julia. She called me and said, you know, "What do you think? Should I give signing authority to Jessica?" And I said, "Well, what do you think?" And she said, "Well, I don't trust her and she's acting weird and it just seems like they are clamoring for the money too much." And I said, "Well, then I wouldn't do it then if I were you. I said, "If you're uncomfortable now, it would get worse 'cuz once you give signing authority over...who knows what's going to happen."

Q. You were subpoenaed to come and testify for us today, you were requested to produce a bunch of documents and you have over time produced a number of things for the Commission. Is there anything that you have in your possession that...?

A. I gave Mr. Wayne another copy of this, plus....

Q. Exhibit #10?

A. Yeah, plus...the whole thing. I already thought that I, um, the thing here....

Q. So we have everything from you?

A. Yep, yep.

Q. Thank you.

At this point the director asked if the Commission members had anything they wanted to ask.

The director then asked Mr. Campbell about the invoices.

Mr. Campbell replied that the invoices were for over \$50; one of the requests in the letter was for invoices over \$50 to be submitted.

Ms. Gardiner next stated that she was going to mark those documents as Exhibit 10A.

The director had a few questions.

Q. Going back to that conversation, you said Julia asked you about whether \$5,000 was reasonable?

A. Yeah.

Q. Was your impression generally that she intended to run a real campaign at that point?

A. Um...I bet...it's hard for me to say. I think that she was serious about running at that time. I think that it's easy for Julia to get caught up in things, especially with people who are stroking her ego. I think that she...she's always had this marijuana activist sort of thing and I've...we've had a lot of arguments about it; that I thought was the primary reason that she was running. Um, early on I wasn't sure how serious she was about it. I think it was a lot of ego. Um, but at a certain point, and this really happened as I recall when Jessica and Dan basically abandoned her for a long time, and she did get serious about it. Particularly towards the end she was busting her hump trying to get this stuff done; calling me for help and doing everything she could. She was able to talk me into doing stuff that I never would have done. So, I mean, I wouldn't have helped with this, I wouldn't have done the signs, I don't even...no...but I mean, she seemed serious, she needed help. Um, I didn't want my kids to see me not helping their mother with something that was important to her. And I also felt sorry for her, too, because she had been abandoned by these people and it was really...I know for her it would have been a really hard thing to be sitting there by yourself and trying to do this. And not having anyone to rely on to help fill in gaps, like picking up this stuff, or helping label stuff, so whatever.

Q. Would you say, do you think it's fair to say, that Julia St. James was taken advantage of by Dan Rogers and Jessica Larlee?

A. Yes. Yeah. I think one thing that would point to her taking it seriously was the night of the elections. And I watched the elections on TV and she was watching them on TV; we were separate, but um. When I saw numbers coming in around 3% I was really impressed. I thought, "Wow, I mean 3% for an unknown independent with issues...um...that's pretty good." And in some...she actually got over 10% in some locations. And when I called her up to congratulate her she was crying; very upset that she didn't get more. And so yeah, I think she took it real seriously.

Q. Did you say you had received an email with the username and password?

A. Yes.

Q. For the Voter Vault?

A. Yes.

Q. Did you receive that before the incident you're talking about when you talked to Dan?

A. Um...before.

Q. I thought that you said that Dan told you to go onto this website.

A. Right.

Q. And I could be misunderstanding your testimony but I thought you said that previous to that you had actually received an email with the username and password and you referred to that email in order to get the username and password?

A. Um...okay. I don't...I forwarded that email from...the one way to check would be I forwarded that email to the detective who I talked to a couple of weeks ago. Because I found it after I had talked to him. Um, I don't remember if Dan emailed it to me and then I forwarded it along; or if I took it and just emailed it to Julia. I can't remember.

Q. And was your testimony earlier that Dan said he had permission to use this?

A. Yes, absolutely I remember that.

Q. And did he indicate who it was?

A. No, he said, "A good friend of mine in the Republican Party."

Q. Did he give you any idea of what the position was within the Republican Party?

A. No. No, I assumed it was the person who had the ID, but....

Q. He didn't leave any impression of high-ranking or...?

A. Well, he did leave an impression that it could have been a high-ranking person, but then again...well, I can't say he left an impression. It was an impression I probably took. But ah, I don't think he...I think I had that impression because it was a password...it was a global password. In other words it gave you full state access.

Q. That's important; you're saying it was not just for Senate district #14?

A. No, it was full state access. I had access to every single register bulletin in the state with that password; so I assumed it was a high up person.

Q. Did Dan Rogers give you any idea why he had authorization or access to a state website?

A. No, what happened was...this part I remember...I was talking to him and I was on my cell phone. And I'm saying, you know, "Dan, what are we going to do about these mailing lists?" And he said, "Let me call you back." And a few minutes later he called back and gave me the password.

Q. Did Dan talk to you about any work he did on any other campaigns? Whether they're...?

A. Well, he didn't say specifically, however, um, the conversation I had with him when he gave me the passwords...and I talked to him a couple of days before about the newspapers...and he just kept making excuses like he had so many other people to worry about; and other candidates to worry about. And when I talked to him, he was on his cell phone in his car when he gave me the password even. And you know, I said, "Dan, you're the campaign manager. It's two days before the election. We got problems here and I'm finding myself in a situation where I'm having to jump in the middle of stuff that I don't want anything to really do with. But, I'm not going to let this whole effort fall and not help out." So he said had other people to worry about, you know, "I've got other more urgent campaigns that are contested."...and think they might have been closer elections or something like that where he thought people might have had a better chance or something. But I also think, this is my conjecture, but I think that he got what he wanted out of her and then moved on; you know what I mean? He had gotten his money and didn't care after that.

Q. Did he mention any other specific candidates?

A. Ah, Sarah Trundy, um, that's the only one I remember.

Q. Any federal candidates?

A. No. The only reason he mentioned her was because he knows, he knew, that she lived probably a quarter mile from me down the road, so...he hadn't mentioned any other candidate unfortunately.

Q. And going back to the automated telephone calls. Can you tell us what he said about using the Republican phone system, which was your phrase? Did you have any idea...?

A. I wish it was actually closer to what he told me; I don't remember. But it had something to do with...the system would call a number and if somebody picked up, it hung up. But if nobody picked up, it left a message, something like that. Does that sound ring a bell to anybody...any sort of technology? That's what I recall it being. So that's what he told me.

Q. You mentioned that Dan's ex-wife was a teacher at Hebron Academy?

A. Yes.

Q. What's her name?

A. Mary something I don't know her last name; she's an art teacher.

Q. And you said earlier you had some suspicions about who might have given Dan the database? It is my understanding that it is only your suspicion.

A. This is only suspicion and only conjecture because he's the only other person I knew that had anything to do with anybody on this campaign is Stavros Mendros. Um, I have no evidence linking him at all, none, so that's a pure guess on my part.

Q. And my final question is. You've known your wife, well, obviously for a long time; do you think her head injury in November of 2003 impaired her in any way that had an impact on everything we've been talking about?

A. Yeah, I think that now she's pretty much fully recovered. She might have some minor imparities that I'm not aware because I don't spend much time with her. But at that time, she was definitely impaired. Um, there was no doubt that she had a very serious concussion, um, and she's not going to like this but she was also drinking very heavily at the time. And also, on prescription medications, and I think the combination of those things made her extremely vulnerable and also susceptible to suggestions that might have made.

Q. Even as late as the spring and summer of 2004?

A. Um, well, I would say definitely when they first approached her. By the summertime she was really coming around a lot more. She's having a lot of memory problems definitely after her accident. Um, by the summer I think she was coming around to being, you know, more back to her normal self although I still can't say fully. I think she still has some memory issues. But again I don't interact with her enough now to know for sure. But back then, um, in the summertime I think she was fairly well recovered, not fully, but fairly well recovered. In the spring she was definitely still quite impaired; to the point when I wouldn't send the kids over and to the point where she didn't necessarily want to have the kids overnight 'cuz she knows for whatever reasons.

The director thanked Mr. Campbell for being at the meeting.

Chair Ginn Marvin asked if the Commission members had any other questions.

Mr. Bigos took the floor.

Q. The other candidates that you are aware Mr. Rogers may have been working with; do you know if those candidates were located in a particular geographic region in the state?

A. No, in fact I only know about Sarah Trundy because she lived in the same town and the other candidates Julia had told me about. And I don't remember any names 'cuz she might not have even told me any names even. Although there was a couple, wait a minute, there was one or two. One guy...okay, here's one story that I remember her telling me about. Some homeless guy that lives under a bridge that Dan and Jessica wanted to sign up for the Clean Elections fund. Um, I don't know if he really lives under a bridge and I don't remember his name, but that was the kind...that was another thing that kind of made me think. That's when I started thinking that this all sounds like an organized activity. You know, it seems like...I think I labeled it at one point. I think I said that Julia had called it a candidate mill. Started to see signs of sort of...why would you go looking for a homeless guy under a bridge and you know, Julia's a very intelligent woman but she has no political experience. Why recruit her to run in a district which was really a big district, a well funded district, and a district with two pretty strong candidates...um, in which she really had no chance of winning as an independent or third party person. So it begged the question why. Is it because they really believe in the fourth branch? Don't know, you know, I don't know Dan well enough to know his level of political conviction. Jessica did seem to have some conviction around the issues when I first spoke with her, when they were collecting fivers. Um, whether that was real or just intended to get me to give them a fiver, I don't know.

Q. How about other candidates. Do you know of any other candidates that Ms. Larlee was working with, any other candidates?

A. No, other than Sarah Trundy perhaps, too. I don't know.

Q. And do you have, beyond the alleged homeless person under the bridge and candidate Trundy...do you know of the scope in terms of the number of any other candidates? Do you have a sense of whether it was maybe one or two others, or whether it may have been six others?

A. Well, I never had a sense from Dan. The only sense I had from Julia was the only word I could use to characterize it would be several. I don't have the exact number and when I talked to Dan on the phone about the mailing list and he said he had other candidates, plural; I looked at that as several as well.

Q. And did you have a sense one way or the other whether they were even located in the state of Maine?

A. I assumed they were; but I guess now that you bring it up, maybe not.

Q. Do you know if any of them were involved in a political party or if they were independents or third party candidates?

A. Ah, as far as I know, again this is as far as I know; it was all Fourth Branch stuff. But I don't know; I really don't know.

Q. Did the campaign have a headquarters?

A. Dan's or Julia's?

Q. I'm sorry the St. James campaign.

A. Well, she did a lot of work out of her house and she did work out a place in Wilton; which seemed to be mostly storage and probably a place where people went to congregate and label stuff and things like that.

Q. Is that the location for which the rent payments were made?

A. Ah as far as I know, yeah.

Q. A Wilton location?

A. Yeah.

Q. What is the location of that?

A. It's on Main Street. I don't know....

Q. Describe the headquarters?

A. Um, it's a building, ah, if, like, you were on Lisbon Street in Lewiston or something like that then you would see just ah...

Q. Store front?

A. Yeah, store front. And it's a store front in the front and there's a Chinese restaurant across the street.

Q. All right.



Mr. Bigos then stated he didn't have any more questions.

Chair Ginn Marvin asked if there were any other questions and then thanked Mr. Campbell for coming in.

A five minute break was called.

The Commission next called Sarah Trundy to the witness stand and introduced themselves. Chair Ginn Marvin next swore her in.

Q. Do you swear or affirm that the testimony you are about to give will be the truth, the whole truth and nothing but the truth so help you God?

A. Yeah.

Q. Thank you.

Testimony of Sarah L. Trundy.

The director started the questioning.

Q. Ms. Trundy, were you a candidate in the 2004 election?

A. Yes.

Q. What office did you run for?

A. Um, State Representative for Minot, Hebron, Turner.

Q. And what district were you running for?

A. I think its District 96?

Q. And where do you reside now?

A. Minot.

Q. What's your, what's the address?

A. 136 East Oxford Road.

Q. When you registered with us you were at 3...well you registered with the mailing address of 307 Center Minot Hill Road. Is that where you lived?

A. No

Q. That was...who lived there?

A. Jessica

Q. Okay, so we didn't have your address at that time...I'm sorry 136 East Oxford Road?

A. Yep.

Q. And what's your zip code?

A. 04258.

Q. And do you have a daytime telephone number?

A. Um, 740-6545.

Q. When you registered it was with the phone number 966-2935.

A. Right.

Q. Was that your number at the time?

A. Right.

Q. But now you're at 740-6545?

A. Right, cell phone number.

Q. Cell phone number?

A. Yeah, it's the only phone I got right now.

Q. You don't have a land line?

A. No.

Q. Where were you living at the time, in April of 2004, when you became a candidate?

A. I was at my Minot, the 136 address.

Q. Thank you.

Q. Do you remember registering as a candidate with the Ethics Commission...filling out forms to become a candidate?

A. Yeah.

Q. What we are going to do... I just have a few documents that I would like to formally have as part of the records so I'm going to hand them to you as we go through the questions. Does that look familiar to you?

A. Not really.

Q. I just handed you exhibit listed as Trundy Exhibit #1.

A. Hmm hmm.

Q. There's a space on the second page of the form for the candidate signature...

A. Oh yeah.

Q. Is that your signature?

A. That is, yes.

Q. Do you know who filled out the other parts of the forms?

A. Ah, I'm assuming that would have been Jessica.

Q. How did the idea first occur to you to run for office?

A. Um, Jessica brought it up to me...um, I don't have a heck of a lot to say about it.

Um, I really wasn't highly involved in the campaign which, apparently, I should have been. Um, I was working a lot at the time and she had brought the idea up to me; and at that point I wasn't terribly busy with a lot of things and I thought it might be a good idea

in support of agriculture and what have you to run for that. So, she's the one that had approached me with the idea originally.

Q. Do you remember when that was?

A. Hmm, date wise? No.

Q. Was anyone else present when she brought it up?

A. Um, Dan was there; Dan was there for a lot of it.

Q. And what's his full name?

A. Dan Rogers.

Q. And did you run as a member of any party?

A. The Green.

Q. Are you now a member of the Green Party?

A. Yep.

Q. Did you become a member of the Green Party for the campaign?

A. Nope.

Q. You were already registered?

A. I was already registered as that prior to the campaign.

Q. Did they talk to you about how you might finance your campaign; that is pay for the campaign?

A. Um...she told me we would be getting some funds to run the campaign; I wasn't completely sure. I'm not familiar with a lot of political things; Jessica knew a lot more about it than I did. So, I just put her pretty much in charge of most of it; but she did say we were getting some funding for the campaign.

Q. And how long have you known Jessica?

A. Um, two years; we went to school together.

Q. Where did you go to school?

A. Um, Minot Consolidated; when we were younger.

Q. Is that a high school?

A. No, it's a middle school; up to eighth grade, so. After that, as for high school we didn't have much contact; she kind of went a different direction than I did so.

Q. So would you say a few years?

A. Four or five years.

Q. And when Jessica said you would get the money; did she say, for the campaign, where you would get it from?

A. Um, I don't believe so.

Q. Did she mention getting any private contributions?

A. Such as...like?

Q. From people who wanted to see you elected?

A. From people personally...? No.

Q. Did she mention the Maine Clean Election Act?

A. Yeah.

Q. What did she tell you about the Maine Clean Election Act?

A. That you fund the campaigns; other than that...like I said, I didn't have a lot of input in it which I feel pretty badly about now.

Q. What public issues did you discuss in your campaign?

A. Um, pretty much it was just on agriculture and local farmers. That was pretty much the basis of it. My dad has a farm so I feel pretty strong about that and what he does for a living and I just kind of wanted to be in support of that.

Q. Would you say you put a lot of work into your campaign?

A. Me personally, no. Jessica did a lot of, a lot of the campaign work, um, along with Dan. I was working a lot at the time and my dad was sick so when I originally agreed to do it I didn't have much going on other than working my regular hours; but kind of in the middle of things I had to start working more hours. The girl I was working with was sick a lot and my dad had some problems; so I really couldn't put in my full effort that I probably should have.

Q. What kind of a living were you making at the time; what do you do for work?

A. I'm a vet tech in an animal hospital.

Q. Would you say it was a real campaign?

A. Yes and no; probably not as real as some others.

Q. Could you elaborate?

A. It probably could have been; pretty much my effort could have been worth a little bit more.

Q. Could you tell the Commission members a little bit more about how much effort you did put into the campaign?

A. Um, I did some door-to-door stuff with her. Getting signatures and what have you and stuff like that. Um, other than that there wasn't a whole lot that I really did.

Q. Those were signatures to get on to the ballot?

A. Right.

Q. Did you, were you involved in collecting \$5 qualifying contributions for the Maine Clean Election Act?

A. Um, one day I went with her to that, yes.

Q. Just one day?

A. Yes.

Q. So how many times would you say you went out together to collect signatures?

A. Um, probably a few times.

Q. How many?

A. Three or four times.

Q. And after that was over, after that effort was made to get on the ballot, what did you do on your campaign?

A. Really not a whole lot. Like I said I really wasn't, and I know this sounds wrong and it probably is wrong and I should have been more involved, but I really wasn't. Jessica had a lot of...did just about everything. If she needed me for anything she would let me know.

Q. Did you ever meet with voters to try to convince them to vote for you, after the petitioning was over?

A. I did not.

Q. I don't mean to put words in your mouth; did you do anything after the petitioning was over?

A. Not a whole lot, no.

Q. Did you believe you could win?

A. Honestly, no.

Q. Why did you run?

A. I was kind of interested; Jessica kind of got me interested in politics and I've never really, was never really big on it, or voting or anything but she kind of got me interested. Pretty much it was the support; in support of agriculture and local farmers. That was my big thing; to see my dad every day out there working and not getting a lot for it.

Q. Did you ever hear of the Fourth Branch Party?

A. Uh uh. (No)

Q. How did you end up paying for your campaign?

A. As far as I'm aware Jessica got some funds, um, not personally like the \$5 thing that you had mentioned and money from the Clean Elections funds...I'm assuming that's where it came from?

Q. I would like to introduce Exhibit #2 which is a form candidates give to us when they want to request the public funds. Do you see this signature line at the bottom for the candidate?

A. Uh huh.

Q. Is that your signature?

A. Yes, it is.

Q. If I could draw your attention to the third of the first four bullet points. Which says, "I have read the Commission's guidelines on permissible campaign related expenditures." These are guidelines that the Commission publishes every election year about what are permissible expenditures of the public funds.

A. Uh huh.

Q. Do you know whether you did read those?

A. Um, I'm sure I did at the time.

Q. You're sure you...did read them?

A. Did at the time.

Q. Were you aware of the requirement that Maine Clean Elections Act funds must be spent only on campaign purposes?

A. Uh huh.

Q. Do you have any idea how much your campaign spent?

A. As far as I'm aware she spent most of what we were given; whether it was on...most of it I believe it was on the mail-outs and signs and what have you like that. Supplies. Other than that, you're gonna have to check more into that with her because I don't have a lot of information on the number exactly. We did pay a couple of people for helping make the signs, um, I know we paid Dan for helping with that and also a gentleman that took a poll for us. Received some money from that.

Q. Do you know how much you paid Dan Rogers?

A. I believe it was a \$1,000?

Q. Do you know whether your campaign paid any money to Jessica Larlee?

A. I believe she did, yes.

Q. Do you know how much?

A. I think it was around \$400.

Q. Did the campaign file any reports, campaign expenditures, with the Ethics Commission?

A. You mean like a report?

Q. Yeah.

A. Um...as far as I'm aware Dan and Jessica were putting that together of what everything was spent on and everything. Um, I know she had all the receipts at one point and they made the report up and everything.

Q. If you could look at Exhibits 3, 4, 5, 6, & 7. Just looking at number three at the bottom of the page of the cover sheet where it says signature line for the candidate...

A. Uh huh.

Q. Is that your signature?

A. Ah, I believe so, yes.

Q. In one of those reports there's a payment to someone named Aaron Fuda?

A. Uh huh. I believe that was for a mailing list.

Q. Do you have any idea how much the campaign paid?

A. I think that one was also around four. Jessica has that information somewhere.

Q. If I said that you spent about one half of the funds, public funds that you received from the Maine Clean Election Act...

A. Uh huh.

Q. On payments to those three people, would that seem about right to you?

A. I don't know half seems like...hard to say, I've never really...like I said been involved in much of this. So it is hard for me to say, but it seems like, like half seems like a lot...to me.

Q. Okay.

Q. Who prepared those campaign finance reports; Exhibits 3-7?

A. Um, Jessica and Dan pretty much did all the paperwork.

Q. Do you know whether Dan did any of them?

A. Dan did a lot of it. But Jessica was my treasurer so she was in charge of all the spending and the receipts and what have you, but Dan came to me with all of the paperwork.

Q. Did the campaign have a bank account?

A. Yes, it did.

Q. Who opened it?

A. Jessica did.

Q. And who had the authority to write checks on it?

A. I think it was just Jessica. I don't believe Dan had authority to do so.

Q. Did you have authority to write checks on it?

A. Yes.

Q. I'm sorry?

A. Yes.

Q. Were you there when it was opened?

A. No, I was not.

Q. Did you ever submit a signature to the bank?

A. No, I did not; so therefore....

Q. Which bank was that?

A. People's.

Q. Where is that located?

A. Um, I'm not sure if she used the one in Lewiston or Auburn. There's a few different branches.

Q. Do you have anything in your possession that would give us the bank account number?

A. I don't...but I believe Jessica should. I know she had some checks.

Q. And even though you weren't present when the account was opened, do you think you have check writing authority?

A. No, I don't believe so; now that you've said that I had to be there to write.

Q. I'm not saying that.

A. No, I was just assuming that being my campaign I would have...my last name was on the...on the checks so...but, that doesn't mean that....

Q. Would you have any objections to sign a release here today that would allow the Commission to request copies of the bank statements and canceled checks?

A. Uh huh, that would be fine.

Q. I would like to ask, if you wouldn't mind, to stick around...well, you're going to be here through the conclusion of Ms. Larlee's testimony; is that correct?

A. Sure.

Q. Maybe I could just type something up really quickly and just have you sign it, would that be alright?

A. Yep.

Q. Okay, thank you.

Q. Who kept the bills and the receipts...for the campaign?

A. Um, Jessica was control of that; she kept all the receipts.

Q. Do you think she did a good job at that?

A. Um, she had mentioned to me at one point when they went to do up the report of exactly what everything was spent on, um, that Dan had access to some of them. But I know she had all of them at one point. At this point, I don't believe she does.

Q. I'm sorry?

A. I said at this point I don't believe she has all of the receipts.

Q. And why would that be?

A. I'm not sure; she's supposed to keep them, I know.

Q. So at one time you think she did have them?

A. I know she did have them. Last year, after the campaign was over, she had all of them.

Q. Do you have any of them?

A. I don't.



Q. Did the campaign buy any newspaper advertisements?

A. I believe so, yes.

Q. Do you know what newspaper?

A. I'm not sure. You'd probably have to check with Jessica. I'm sorry I can't be more helpful.

Q. Did you buy; did the campaign buy any radio ads?

A. I don't believe so.

Q. Did it, send any literature to voters?

A. Yes, we did some mail-outs.

Q. What did you do; or describe it?

A. I'm not completely sure, but I know they were mailed out, um, Dan printed out a whole bunch of them to mail out. Jessica was supposed to have a sample of that, but...I don't think she has it.

Q. Do you know who prepared the mailing?

A. Dan.

Q. And do you remember what it looked like?

A. I do not.

Q. Did you ever see it?

A. No.

Q. You never saw a single copy of the mailing?

A. No.

Q. Do you know how he printed it?

A. As far as I'm aware at home on a printer was what Jessica told me.

Q. Whose home?

A. Her home or his.

Q. On one of their printers?

A. Yep.

Q. Any idea how many he printed?

A. Not sure, no.

Q. So there's the one mailing; was there another mailing that you were aware of?

A. I think it was just one, but I can't be sure.

Q. And do you know how, who obtained the postage for them?

A. It would have been either Dan or Jessica.

Q. There's a reported expenditure to Brown Fox Printing; what was that for?

A. I'm not sure.

Q. Was there any products at all that were, that came from a professional printing company?

A. I can't say for sure; I'm not...like I said, I feel horrible that I wasn't more involved with this but....

Q. Okay. So you mentioned the mailing, I'm just trying to...let's just find out if there's any other literature or anything else...I'm sorry, I'll cool it on the questioning...do you want some water?

A. Yes.

Q. We're just trying to understand what happened....

A. I know.

Q. Is there anything else written down that was given out to voters other than that mailing?

A. Not sure.

Q. And there was a reported payment to the United States Post Office for \$111; that was on September 2<sup>nd</sup>. Any idea what that was for?

A. I would assume it was for postage.

Q. For that mailing?

A. I'm not sure.

Q. Alright, maybe I'll...I'm just going to pick up receipt expenditures and see if you know anything about them, okay?

A. Okay.

Q. There was a payment...ah your very first expenditure was to Jessica Larlee for \$456. That was the amount of money you received for the primary election as a candidate that did not have an opponent in the Green Party.

A. Are you asking if I received that?

Q. No, no. Your campaign reported making an expenditure to Jessica Larlee of \$456 and it just so happens that that was the amount the state paid your campaign for the primary election; because you were running as a Green candidate and did not have an opponent, that was the amount the state would pay a candidate.

A. Uh huh.

Q. Did you consider, you didn't have money for anything other than paying the money directly to Jessica?

A. (*Crying*)

Q. Here's what I'm getting at...in April you got this payment for \$456. There's no other campaign expenditure of any kind for April, May, June or July; that is just not something that the staff at the Ethics Commission sees very often.

A. Right.

Q. Usually candidates are more active, they have expenses, and I'm just trying to understand. Did you decide to pay the money to Jessica?

A. No, I really didn't make that decision.

Q. Your very next expenditure, dated August 1<sup>st</sup>, and that was a payment of \$1,000 to Dan Rogers for consulting. What did he do for your campaign?

A. That's what you'll have to check with Jessica on. She probably has a lot more, twenty times the information that I have for you; which is....

Q. You must know something about what Dan Rogers did for your campaign?

A. The only thing I saw of Dan was when he had some paperwork that I had to fill out, or something that I had to sign; that's pretty much when I saw Dan. So what he actually *did* for the campaign; other than that, I can't say, I don't know.

Q. I'm sorry; did you say he was involved in the \$5 checks or not involved?

A. Dan?

Q. Yeah.

A. That was me and Jessica that went door-to-door and did that.

Q. So the answer to the question about Dan is...was he involved in that?

A. No.

Q. No.

A. He wasn't involved in that.

Q. Was he involved in gathering the petition signatures to get you on to the ballot?

A. He may have been; me and Jessica did a lot of that, too.

Q. You're not sure though.

A. I'm not sure. When we were doing it he was not present, no.

Q. He assisted on the campaign finance reports you testified.

A. Uh huh.

Q. Was there anything else you can think of that he did for your campaign?

A. Like I said really all I saw of Dan was if he needed me to fill out paperwork or to sign paper or what have you; pretty much what I saw of Dan.

Q. Did he ever give you a bill for his services?

A. Me personally; no.

Q. Did you ever hear that he'd created an invoice or a bill...or a contract?

A. No.

Q. There are a number of expenditures to AOL...for internet services....

A. Uh huh.

Q. Was that for your campaign?

A. Um, I believe...she had a vote Trundy mail set up and what have you for email and everything. But I'm not sure if she had actually AOL set up.

Q. What are the emails printed?

A. I'm not sure, Jessica had set that up. Not completely.

Q. There are a number of payments to Wal-Mart; there's \$412 for office supplies, \$181 for office supplies. Can you give this Commission any assurance that that was for campaign services as opposed to personal items that can be bought at Wal-Mart?

A. I know she bought supplies, but after seeing everything she had bought it wouldn't even add up to that much.

Q. What did you know she bought?

A. Staplers and stuff like, inkjet printers and what have you. And I know, I think she had mentioned to me that Dan had got a printer, cuz his had kicked the bed. So, I'm not sure if that was from Wal-Mart or not.

Q. Going back to that expenditure of \$750 dated September 2<sup>nd</sup> to Aaron Fuda; the remarks for the expenditure say consulting and mail list.

A. Uh huh.

Q. What were those mail lists?

A. Mail lists? I believe it was...you mean like what type of mailing lists...or?

Q. Yeah from both, what did you use them for?

A. I'm not sure as to what type it was, um...

Q. Do you know him?

A. I don't personally; I've heard of him.

Q. What did you hear about him?

A. I just heard the name, as personally to know about him a lot, no.

Q. And as for the consulting; is he a consultant?

A. I wouldn't say so.

Q. What do you know about him?

A. Not much. Other than that Jessica got the mailing list from him

Q. Do you know what kind of consulting...consulting analysis makes it sound like he provided some sort of services to your campaign; do you know what he did?

A. Right. I'm not sure, no.

Q. I did a search for him; I saw there was a marijuana legalization activist by the name of Aaron Fuda who has big events out in western Maine.

A. Uh huh.

Q. Do you think that's the same guy?

A. I would assume so.

Q. I'm just trying to understand if there were real lists provided and why he would....

A. There was some provided.

Q. You saw them?

A. I did, but I don't know what, I don't know if it was...actually what type of list...you know what I mean? I'm assuming they had different types of lists for different categories of people; whether it was people that support the marijuana or people and what they support the mailing should go to. But as for what type of list she got from him; I'm not sure.

Q. Did they say anything about him...about Aaron Fuda?

A. Mention that we paid him money or anything?

Q. Yeah.

A. No, I was not aware of that.

Q. Is he a friend of theirs?

A. Personally, I don't believe, like, on a close basis, no.

Q. There was a \$40 expenditure to Kyle Corcoran for freelance writing. Is he a friend of yours?

A. Mine personally, no. But he did an article for us.

Q. What did you do with the article, was it in a publication or...?

A. I'm not sure.

Q. Did you receive the article?

A. I didn't.

Q. So how do you know he did it?

A. I don't.

Q. There's a payment of \$55 to Justin York for signs, it says labor and in parentheses signs; do you know him?

A. I don't know him, no.

Q. What kind of signs did the campaign have?

A. Um, we had some smaller ones that she had printed off on paper that were actually printed. And then she had some larger ones that we had made and painted and done the whole thing; and she had quite a few of them.

Q. The signs were printed on her home printer...is that?

A. The smaller ones; no I don't think you could do them on a printer though, no.

Q. They were professionally done?

A. Yeah, I think we had them; definitely had to take them to have done because it was on bigger piece of...it was double-sided.

Q. There is that one payment to Brown Fox Printing for \$136 for signs.

A. Okay.

Q. The amount of signs you saw, was that...?

A. There was quite a bit of the smaller ones and then we had, I'm not sure, there was a large quantity of the big signs. Probably ten or fifteen, maybe twenty of the larger signs. We had a lot more of the smaller ones.

Q. There's a payment for just under \$200 to Home Depot for signs?

A. The paint and the wood and what have you.

Q. Were you involved in painting any of them?

A. Yep, I did help.

Q. Were there volunteers on the campaign?

A. As for....

Q. People who spent a lot of time....

A. Just for help? No.

Q. Were there people who were paid?

A. The only person that really helped without wanting anything from us was her brother.

Q. Was her brother?

A. Yep.

Q. And his name is?

A. Brett.

Q. And where does he live?

A. In Minot.

Q. I'm sorry?

A. In Minot.

Q. Do you know where?

A. I'm not sure...he moves about a lot. I'm not sure if staying with her mom or....

Q. Did you pay people to work on your campaign...I mean other than the people we had mentioned; Dan, Jessica, Aaron Fuda, and Kyle Corcoran...anybody else?

A. Did you mention...I think it was Justin...that had done the poll for us?

Q. Oh, Justin York did the poll for you?

A. Yes.

Q. Poll as in p-o-l-l?

A. Yeah, well...outside the store saying "would you vote for Sarah Trundy?"

Q. Do you know how much time he spent doing that?

A. I'm not really sure, no.

Q. Why did the campaign want to do a poll?

A. Just to see as for percentage of the vote; what it would be, which was a lot more at the store near my house than it was in reality. Of course.

Q. I'm just a little confused here. You had made the decision to run, you qualified for the ballot, you qualified for the public funds; I just want to know why you would end up taking a poll?

A. I'm not sure why Jessica decided to do that.

Q. Did you actually see him doing the poll?

A. Uh huh.

Q. Asking people?

A. (*nod*)

Q. The payments to AOL; were they used at all for personal?

A. No, she has, um, a couple of different computers that she was using at the time, so I know she had one set up just for the campaign.

Q. There was a \$111 payment to the postal service and this gets into the expenditures and then there was a \$740 expense to the postal service on October 27<sup>th</sup>; do you know what that was for?

A. I do not know.

Q. So you had the one mailing, you had signs; which you think might have been from Brown Fox Printing.

A. Right.

Q. You had the homemade signs.

A. Right.

Q. Were there any other communications at all that voters saw or that went out to voters?

A. Other than us doing our door-to-door...signs and what have you...no.

Q. You did the door-to-door to get the \$5 checks.

A. Uh huh.

Q. You went door-to-door to get the signatures on the petition; and your testimony was you didn't do any more door-to-door sort of campaigning?

A. Right. Like I said, after we kind got started with this everything got kind of crazy...in my life.

Q. Do you have anything else relating to the campaign; any literature, campaign literature, anything like that?

A. (*shaking head*)

Q. No signs?

A. (*shaking head*)

Q. What happened to the signs?

A. I have one.

Q. You have one?

A. Yeah, I think she...those, I think, ended up, well her landlord now, whether it was his garage or his barn area.

Q. Do you know whether any of the Maine Clean Elections Act funds were used to buy electronics equipment?

A. I don't believe so.

Q. When was the last time you talked to Dan Rogers?

A. Um, over a year ago, or about a year ago now. Since we did this, I haven't seen him nor hair of him.

Q. Have you ever seen that notebook?

A. Till today, no.

Q. Did you ever hear Dan or Jessica talking about some literature they did in connection with Dorothy Lafortune. It was a special election in Biddeford?

A. No.

Q. Ever hear of HOMO-MIM?

A. What's that?

Q. HOMO-MIM is the name on the literature; did you ever hear of that before today?

A. No. Nope, today was the first time I've seen that; when you showed me.

The director then stated that he had no more questions.

Chair Ginn Marvin asked if the Commission members had any questions. At this time, Ms. Trundy again expressed how sorry she was she didn't have more for the Commission.

Mr. Bigos took the floor and questioned Ms. Trundy.

Q. Did Ms. Larlee or Mr. Rogers represent to you that they were working on any other campaigns during the same election?

A. I believe they were working on Julia's campaign; other than that...I know Jessica didn't have a wicked lot to do with that after a while. She had some problems or whatever.

Q. Do you have any experience working on campaigns before these people?

A. I don't. I don't.

Q. Any friends or relatives that ran for office or have any campaign experience?

A. Nope.

Q. Do you know what Dan Rogers is doing now?

A. I don't.

Q. How were you presented with signing reports to be filed with the Ethics Commission?

A. Not very thoroughly.

Q. Describe, describe the type of...?



A. Usually they came to me, usually it was Dan that came to me with paperwork. He'd show up while I was at work in the middle of stuff. I didn't have a heck of a lot of time to read over everything like I should have been able to before I had to sign; because he needed to have it filed or whatever, whenever...you know what I mean?

Q. Would he show up at your place of employment where you did vet tech activities?

A. (*nod*)

Q. And how long of a period of time would he give you to examine the paperwork?

A. Not long; a few minutes. So then it was hard on me to try to, you know there's things going on and I'm trying to understand it.

Q. Did he have an appointment to do that, or would he show up unannounced?

A. No, he would just show up.

Q. So is it fair to say he was interrupting you?

A. Yep, but you know I realized I had a responsibility when I took this on, but....

Q. Could I draw your attention to Trundy Exhibit 4; do you see where you signed your name at the bottom?

A. Uh huh.

Q. Now what does it say above the signature line where you sign your name?

A. It says I have examined this report and to the best of my knowledge it is true and correct.

Q. Is that all it says?

A. And complete.

Q. Okay.

Q. Did the campaign have an office or headquarters?

A. Pretty much Jessica's house was headquarters. Yeah, that's where everything, a lot of stuff, got done.

Q. Was it in a certain space or was it intermingled with whatever her living quarters were?

A. No, she had...pretty much it was designated to the kitchen table. That was her personal area...so.

Mr. Bigos thanked Ms. Trundy. Chair Ginn Marvin stated she had a few questions.

Q. Did you know Julia before you ran for office?

A. I still to this day haven't met Julia.

Q. Oh, you don't know her?

A. No, I don't know her, no.

Q. And who did you run against?

A. Um, I can't remember the Democrats name.

Q. Can you remember the Republicans name...or whether or not ...?

A. Is it, ah, Joan Deschenes...?

Q. I don't know.

A. But the Democrat, I can't remember his name.

Q. Okay. Did you help put up any signs?

A. Yep.

Q. You helped paint some signs, right?

A. Yep.

Q. Do you know where any receipts might be?

A. Um, last I heard Jessica had mentioned it to me. I know she had them all together, she showed me she had them all together. This was last year after this was all said and done. And she mentioned something, her and Dan writing up a report or what have you and now she only has like three or four of them...so.

Q. How do you know that that mailing happened; did you go to someone's house...or did you see it in your mailbox? How do you know that happened?

A. No. I don't.

Q. You never saw it? You never saw any in town?

A. No. No.

At this time Chair Ginn Marvin thanked Ms. Trundy for coming in and asked if there were any more questions. Chair Ginn Marvin cautioned Ms. Trundy not to speak to any of the other witnesses.

### Testimony of Jessica J. Larlee.

The Commission next called Jessica Larlee to the witness stand and introduced themselves. Chair Ginn Marvin swore her in.

Q. Do you swear or affirm that the testimony you are about to give is the truth, the whole truth, and nothing but the truth so help you God?

A. Yes, I do. Um, can Julia St. James not be in this room? I'm not joking. I'm on a meditation program and I'm very sensitive to psychic energies. If you measure my brain waves you'll see that I have a high level of delta waves like Buddhist monks do and I do believe she is capable of psychically attack...attacking me.

Q. Ma'am, she's not in the room.

A. Oh...okay, good.

Counsel Gardiner started the questioning.

Q. Ms. Larlee, could you just state your full name for the record please?

A. Jessica Joy Larlee.

Q. And where do you currently reside?

A. 307 Center Minot Hill Road, Minot, Maine

Q. And is that the same location where you lived in 2004?

A. Yes.

Q. How long have you lived there?

A. Since...I've been there like two and a half years now or, like, two and a third years.

Q. And are you currently employed?

A. Ah, yeah, I work for my landlord on the farm where I live. I do housekeeping and I'm a nanny and I do chicken barn chores.

Q. You were involved in 2004 in campaigns for Senate for Julia St. James and for House for Sarah Trundy; correct?

A. Correct, yes.

Q. Were you involved in any other candidate campaigns in 2004?

A. Um, yes, I worked for, ah, Abraham Chipman.

Q. And what was he running for?

A. State Representative in Harpswell.

Q. Any other campaigns in 2004?

A. Um, I made phone calls for George Bush for one day because the boy there told me he would take me to the Phish show if I did, which he never did.

Q. Is that the extent of your involvement in political campaigns in 2004?

A. I think so.

Q. Had you been involved in any campaigns prior to 2004?

A. Ah, yes, I worked on Biddeford election. I ran myself in 2000. I got signatures and stuff for various candidates. I usually do signatures; that's how I became involved in politics. I was a signature gatherer for referendums. Um, I...let me think...yeah, I think that's all of them.

Q. Which referendum campaigns were you involved in?

A. I have petitioned for...candidates, ah, John Michael, um, probably more. I petitioned for him when he wanted to get on the ballots to run for Governor. I petitioned for casinos, for slot machines, ah, I petitioned for....oh, what else was there...there was a bunch of them.

Q. How did you get involved in those campaigns?

A. Um, well I met...when I was...on my twenty-first birthday I met John Michael at a bar in Auburn. And then he called me up...and I called him because he told me he was a State Representative and my mom had a non-profit organization doing art outreach to at-risk youth in Auburn. And we wanted to know about, like, art funding and stuff like that and so I called him and I asked him. I had no idea of his history or anything; I figured, you know, this guy I met he's State Representative, he must know about this stuff. So I called John Michael and I asked him about that and then, um, a couple of weeks later he called me and he asked me if I wanted a job, um, petitioning, gathering signatures. I did extremely well. I got like three hundred signatures a day, which was like \$300 a day. It was like my first real job ever and so I liked it and so I continued to do it.

Q. And that campaign was which one?

A. Ah, John Michael for Governor or whatever...something like that.

Q. And what did you run for in 2000?

A. State Representative.

Q. What district?

A. It was then called 74 I believe; New Auburn.

Q. And did you run as an independent, as an unenrolled...?

A. Yes.

Q. Candidate?

A. Yes. I didn't even really know what I was even running for. Um, like, I was petitioning at Shaw's for John Michael and the guy who was running his campaign, his name is Dan Rogers. He came up and he's, like, "Here, we have petitions for you, too." Oh, I think during that time I also helped the city council candidates on the ballot; that I didn't mention. But the campaign was for city council in Lewiston, Steve Roker. But yeah, and then they brought petitions with my name on them and they said we're running you for office. And I didn't know what it was, but I did know that I wanted to, like, save the world and stuff 'cuz I had gone to college and thought that I was gonna save the world basically so, um, so I did.

Q. And did you run an active campaign?

A. Yes. I lost by 120 votes; I did very well.

Q. When did you first meet Dan Rogers?

A. Ah, when...when John Michael called me and offered me a job, um, he put me on three-way calling with Dan and I had never met him. And he said he was in Utah and that Dan, um, was running his campaign, and that Dan would be the one to contact. The one who would pay me and the one to collect my signatures and stuff.

Q. And was Dan Rogers involved in any of the other campaigns that you have been involved in?

A. Yes.

Q. Which one?

A. Just about all of them. Because....

Q. Did he get you involved in any of the other campaigns?

A. I would not have been involved in any of them if not for him. Except for Trundy, that was my idea.

Q. And tell us how you got involved in Sarah Trundy's campaign; did you approach her about running?

A. Yes. Ben Chipman from the Green Party called me and he said that they wanted to run as many candidates as humanly possible. And he said that they had nobody up my way, like out in the woods up north; to him its north, he's in Portland. And he asked me if I knew anybody who would be able to run as a Green and he said that they had to be known and you know, of good character and not have a criminal record, stuff like that. And so I asked my friend Sarah if she would like to run.

Q. And how long had you known her at that time?

A. I have known Sarah since third grade; we have always been friends.

Q. And why did you pick her as a candidate?

A. Because everybody in town knows her...and...I knew she could get a lot of votes. I though perhaps she could even win. And I thought that I was doing something nice for her.

Q. And you served as treasurer for her campaign as well?

A. Correct.

Q. Did you suggest to her running as a Clean Election candidate?

A. Yes.

Q. Let me show you...any documents were going to be talking about today we have labeled with yellow stickers.

A. I don't have very many documents.

Q. No, these are documents I will be handing to you and to ask you any questions. I'm just indicating that we're using documents that are numbered so we can make it clear for the records.

Q. I'm going to show you ah, first, Trundy 1 is the number on that; candidate registration. Did you prepare that? First, do you recognize that form?

A. Yes.

Q. Did you prepare it?

A. Yes.

Q. And did the candidate sign it?

A. Yes.

Q. This is Trundy 2, which is a request for certification of Clean Election Act candidate...

A. Yeah...

Q. Signed by Sarah Trundy...

A. Uh huh.

Q. Did you prepare that form?

A. I know that one looks like Dan's handwriting.

Q. On the top two lines where you filled in the candidate's name...?

A. No, that's not mine, that's Dan's handwriting.

Q. Okay. When did Dan Rogers get involved with the Trundy campaign?

A. Well, originally I wanted to keep him out of it because I wanted to do something on my own without him for once and not have him getting all involved in everything I do. And I didn't like him and I didn't want to be friends with him anymore. And um, so, I was going to do it just on my own and then I got really busy and he said he would do mail. And I dunno then he came back and I wasn't mad...and I don't know, but, I don't know. He was around.

Q. Let me show you these four different exhibits labeled Trundy 3, 4, 5 & 6; they are all campaign finance reports....

A. Yes.

Q. Can you look at those please? The signature on the bottom of the first page on each of those documents....

A. Yep.

Q. Treasurers signature; is that your signature?

A. Treasurer...yes, yes, and yes.

Q. Did you prepare these reports?

A. Um, some of them I did. Dan helped me with some of them. I handed him a pile of receipts and he did it, like the last couple I believe....

Q. When he....

A. Um, I don't know; I can look and see if it looks like Dan's handwriting. This looks like Dan's handwriting....

Q. I'm sorry, which one; three?

A. Um three; this is Dan's handwriting. This is either mine or Sarah's. That's my handwriting.

Q. You're looking at Exhibit 4?

A. Exhibit 4, yes; front page is my handwriting. I don't know, yes, this one I did myself. And...this one Dan did this....

Q. Number 5...?

A. And 6, are we on that one too? This is Dan's handwriting.

Q. Okay, so 3 you did and 4, 5, 6, he did?

A. Uh huh.

Q. Was he involved in your discussions with Sarah Trundy about running for the state representative campaign?

A. Um, initially no. Initially me and Sarah did it all on our own; we went out and got signatures and got fivers and we ripped the exhaust off her mom's car going down bumpy road in Hebron Maine. And we did it all on our own at first.

Q. So when did he first get involved?

A. Um, I don't know.

Q. What was the first activity that he was involved in?

A. I don't remember. I don't remember. He may have helped...I think actually for the ballot signatures, I think he may have driven me around. Like, me and Sarah did it and then we didn't have enough and I think he drove me around to get the remainder...? So I guess, I dunno, like, sometimes I would be friends with him and then sometimes I would throw him out and not like him anymore. So...I'm not quite sure when all that...but yeah, I think I remember him driving me to get the rest of her ballot signatures.

Q. One more campaign finance...

A. 'Cuz he broke my car, in Hebron, that's right. All the cars break in Hebron; okay, sorry, go on.

Q. And that was during the process of gathering up the, ah, contributions?

A. Yes, we were looking for someone who was a registered Green on Sodom Road...which turns into a logging road and he drove down and I got a hole busted in my oil pan. Yep, he helped.

Q. Was the candidate with you at that time?

A. Um, no. When me and...me and Sarah went out together and then me and Dan went out together. Sarah had to work and stuff.

Q. I also wanted to show you Trundy Exhibit #7 which is another campaign finance report; and is that your signature on the cover page?

A. Yes.

Q. And can you take a look at that report and tell us whether you prepared it...?

A. This is Dan's handwriting.

Q. When, ah...did you open the bank account for the Trundy campaign?

A. Yes.

Q. Where did you open the account?

A. People's Heritage Bank at Shaw's in Auburn.

Q. And was anyone else with you when you opened it?

A. No, I was in an office with a lady by myself; a bank office.

Q. And who had authority to sign checks for the campaign?

A. Me.

Q. Were you the only one with that authority?

A. Yes. Sarah did not want to come with me.

Q. And who made the decision about what expenditures would be made on the campaign; on the Trundy campaign?

A. Um...I did with the input of Dan. He like, you know, kind of guided me through what should be done and stuff to get votes.

Q. What was the...strike that. Did you make all of the purchases of the goods for the campaign?

A. Yeah, I was there.

Q. And did you keep receipts?

A. Yes, I kept receipts. I can't find all of them right now.

Q. What did you do with them during the campaign?

A. I stuck them in a drawer. Well, I stuck them in...well, I had this, like, this jar thing. It was a pot, a plant pot, and I crammed them all in there; or in my drawer where I keep my pens, my desk drawer.

Q. And they are all there?

A. Um, four of them I found mixed in, I went through....You guys subpoenaed me and I was, like, okay, I have to go find this stuff. Um, four of them I found and I did not find anymore. I do know that I did have them when I handed them to Dan to make a campaign report.

Q. And did he ever give you anything back; any documents back to you after he did the reports?

A. Um, I think he stuck them back in the drawer or something.

Q. Did you check to see that he had returned them all to you?

A. I don't know, I don't remember; I wasn't that detailed. I was, like, here, can you do this, I can't.

Q. Did you, um, had you ever been a campaign treasurer before the Sarah Trundy campaign?

A. Ah, I was my own treasurer when I ran, but that's it. He helped me with all those reports too.

Q. Did you ever review what the statutory requirements are for treasurers and what treasurer's obligations are either for your campaign or for the Trundy campaign?



A. Um...not really; Dan just told me what I was supposed to do. And Ethics would send me, like, you know, things in the mail that I was supposed to fill out and send back.

Q. What did he tell you your obligations were as the treasurer?

A. Um...he said save receipts and, you know, just keep track of everything, basically.

Q. Did he tell you how long you should save receipts for?

A. No. I now know that it's two years. I had them! I had them; I don't know where they went. I might still have them; I have boxes of stuff that's like general...like my desk is all cluttered. My desk looks like the advertisement for attention deficit disorder and it gets all cluttered and I take everything and throw it into a laundry basket and say, well, if I don't need anything out of that basket in six months then I'm throwing them away. But none of them have been thrown away...Um, so yeah, I might still have them; I don't know. I can look for them more.

Q. Have you, ah, did you have any conversations with Dan Rogers, or any contact with him at all, since you have received the subpoena for this Commission meeting?

A. Yes, he had instant messaged me...um...I think it was either Monday or Tuesday; yesterday or the day before. I think it was...last...no it wasn't last...yesterday, it was the day before and he instant messaged me.

Q. And what was his message?

A. Um...he said Julia's trying to blame everything on you. And he said that he needed my computers to get all the paperwork and stuff...um...in order because he said he would help me with paperwork and whatever. And he said that he needed both my computers and I told him that I could email him any files that he needed from the tower and the laptop I got after all these campaigns were done and I'm not quite sure why he was asking me for it. I think he probably wanted to steal it or something. It made no sense to me why he would ask for my laptop.

Q. Did he ask you for any specific document off your computer?

A. He said that they were a bunch of invoices that he mailed Julia and Julia was claiming that he never mailed her any invoices and so he needed those from the computer. I offered to email them and he said no, he needed the whole computer and my laptop which has nothing pertaining to Trundy, Julia or anything on it. It has my fiction writing on it and that's it.

Q. Did you, ah, look on your computer to see if you had any invoices from Dan Rogers?

A. Yes and, um, those I gave the St. James folder right there this morning. I...there's a file in the tower computer called Julia and I just started to copy everything that was in that file onto floppy disks and, um, I only had three and it said that they were full. And I kept having to switch them because it said the disk is full, the disk is full, the disk is full; and then...um...it said try a larger capacity, but I don't have a zip drive and I was just gonna do... and I only had three disks. And so I don't know if it saved properly because it was, like, saved in the middle of a document and then, like, the document was not fully saved and then it would say, you know, disk full, switch to larger capacity or something.

So if, um, it didn't save on those disks properly then I know that that's incomplete because the entire Julia folder which had all the stuff for her newsletter in it; that's still on my computer, I could email it, but I don't have enough floppy disks and it would take hours to email it so I didn't do it this morning before I came. 'cuz I didn't realize how big the file was.

Q. Do you know whether any invoices from Dan Rogers are on the floppy disks that you created?

A. I know they are in the Julia file at my house; I don't know if they got saved on all those disks.

Q. And you're referring to a white manila folder that says St. James on the front; and those are documents that you brought with you today in accordance with the subpoena?

A. Yes, that is all I could scrounge up out of my house concerning Julia.

Q. Okay, but you are willing to go back and email files...?

A. Yeah, I can email the whole file. But I didn't have enough floppy drive things.

Q. Did ,ah, Dan Rogers communicate anything else to you in his message on Monday or Tuesday of this week?

A. Um, yes he told me that he had several email conversations with Jonathan Wayne and that he was going to be allowed to testify over the phone tomorrow.

Q. Tomorrow meaning which day...tomorrow

A. The day after the hearing, Thursday is what he said. And I thought that sounded dumb that he got to testify and I had to drive all the way down here; but I assumed he was probably lying so. Oh, he also told me he was in Boston; which ain't true. I don't think.

Q. Where do you believe he is?

A. I believe he's at somewhere in driving distance from my house which is Minot. Minot, Maine.

Q. And why do you believe that?

A. Because after I had this email conversation, the internet conversation with Dan, his friend Stavros Mendros called me up and was, like, "I'm gonna come pick up those computers for Dan." And I said, "No you're not; you're not taking my computers. Because I probably would never see them again." And, um, he was like, no, for real; he's, like, Dan needs stuff for you hearing tomorrow or Wednesday or whatever. And I was, like, I don't need Dan's help for this hearing and he was, like, no, I'm coming to get those computers right now. And I said well, sorry, I went to a hippie rally and we all decided that we were gonna say to hell with the system and we all smashed our televisions and computers and if you want to know where the television graveyard is I will tell you and you can go sift through it for a hard drive to these computers; but they're gone. And he said he didn't have time to mess around and he was coming to get them and I said, no, you're not and he said fine it's your hearing and he hung up. And he was very mad at me.

Q. Do you know where Dan Rogers is living at this time?

A. Ah, nope, I know Stavros probably knows where he's living. Um, after the last time that I had contact with him, he like took off and, like, no one was allowed to tell me where he was. You know, like, my friend Danielle was doing petitions, getting signatures for Stavros on, um, like...

Q. On these referendums?

A. Yeah these referendums that had going on. She was doing that signature gathering and she told me she was not supposed to tell me where Dan lives but he lives at that house with that guy Chris. Which is I believe the address listed on Citizen's to Save Maine. If you call the house you get an answering machine that says "Hi, you've reached Stavros Mendros and Chris Raisakis and the Citizen's to Save Maine, please leave a message..." so, like, whatever, like, the Citizen's to Save Maine is...I could point out the building. It's off Main Street in Lewiston, um, I don't know...that might be listed as Stavros's address too somewhere, I'm not sure. I know that the last I heard he was staying there, but then a cop came by and told me he was living in the Auburn Mall apartments. So I don't know if Danielle was told to purposely feed me misinformation or what, I don't know. I haven't seen Dan...I suspect he was stalking my house but I'm not sure.

Q. When did you last see Dan Rogers?

A. Um...hmm...well, I've been with my boyfriend for a month and a half; it'd be like two and a half months ago, three months ago. Something, I dunno, something like that.

Q. If I could turn your attention to Trundy Exhibit #4; dated on the front page as June 2<sup>nd</sup>, the 6-Day Pre-Primary report.

A. Uh huh.

Q. And refresh me, is this one of the one's you prepared?

A. Um, yeah, I could have done this 'cuz its kind scribblely; that 4, that 4 is Dan's 4. But this 4 over here is mine.

Q. I'm sorry, when you say that 4 you need to let us know what you are talking about.

A. Okay, there's the 5/1/04 on page 2; page 2 it says 5/1/04.

Q. Yep.

A. That 4 is Dan's; that's Dan did the date. And the other 4 is mine.

Q. The \$456...?

A. I wrote that in.

Q. Okay and that is the full amount that the Ethics Commission distributed to candidates who were uncontested in the primary?

A. I guess so.

Q. When you wrote down amount received, initial distributions, I assume that's all the money that you had got.

A. Right, right, yes.

Q. And on the third page, did you write in your name and the same dollar amount there on that page?

A. Yes, that is my writing, although the date Dan wrote.

Q. Okay.

A. Yep, I wrote that.

Q. So, you wrote; did you write a check to yourself?

A. Um, yes I did.

Q. And what services did you provide for that \$456?

A. Um, that was my pay for the entire campaign.

Q. Did you give an invoice?

A. No. I thought the check, like, was a receipt or something. I can do one; I can make one.

Q. If you would turn to Trundy Exhibit #6, second page; is this Dan Roger's writing...or is this?

A. This is Dan's writing.

Q. All of it?

A. Yes.

Q. In terms of the expenditures listed here though, the first one; a \$1,000 to Dan Rogers. Would you have written the check for that amount on the campaign account?

A. Yeah, I wrote that.

Q. What was that for?

A. That was for, um, consulting and all the mail that he was doing. He said that that was average amount of money received by a campaign consultant and he showed me campaign finance reports of, like, other candidates where they paid similar amounts to a group called Ourso Beychok. And he said that they were a mailing house and that what they did was mailings. And he said that with him I could get more mail for my money because he used printers and refilled the ink cartridges and it costed way less than like a commercial printer to use. And so that by using him instead of like Curry Printing or something that I would be getting more mail which would give us an edge...in the election.

Q. What mailings did he agree to do?

A. Um...well he...made one. He was basically in charge of the mailing; I don't have them anymore.

Q. The mailings?

A. Yeah, I, I, I don't have them; I did at one point have them and I think I showed Sarah too, I don't know if she still has them. Probably not, she throws everything away. But, um...he was gonna do, like, it was, like, one mail that he showed me; like a post card, that said, you know, vote Trundy and stuff. And he asked me what I wanted for, like, designs and Sarah has tattoos on her big toe; one is a moon and one is a star and so I thought it would be cool if we put moons and stars and stuff on them and so we did that. He said that he was going to send like a mail to, to, like, one to Democrats and one to

Republicans. Like, one to single men and he was going to do a different one for youth, like, youth voters; like, people under twenty-five. So he said basically he said he would take this one template and alter it depending on what, um, what demographics it was going to be sent to and...um, that some people would receive two to three mailings and some people would receive one and oh, he said that's what he's doing; it sounded like a good idea so I said go for it.

Q. And so...so you saw the postcards that he actually prepared?

A. Yeah, I saw it on my...yeah, on my computer, the one that he was asking me for back. No, not that computer; it was on his old computer I think. Which has...

Q. You saw it on a computer screen?

A. On a computer screen I saw it, yeah; and I also saw it getting printed. He, ah, he did a lot of them at my house; he printed a lot of them at my house and then he printed the rest at his house because I was getting sick of him and the printers were running until, like, three o'clock in the morning and they were starting to get old and, like, worn down and they're going "Wreeee, a reahhh" and they were, like, squeaking and stuff and so. So he took them and did the rest somewhere else. But I did see the majority of them being made.

Q. What mailings actually, I mean mailing, how many postcards actually were mailed out; do you know?

A. Well how many people were in the district...? There was like 1,700 in Minot, I don't know if there is 1,700 or 1,500 voters in the town of Minot; I'm not sure. There's, like, 900 people in Hebron and then I don't know how many people are in Turner; I think there may be, like, you know, roughly 1,500 in Turner as well. So if you add all of those up and then what he does is, like, if there's two people with the same address and the same last name he, like, combines it and sends it to one, you know, it would be, like, the Smith Family instead of one for Joan Smith and one for John Smith. It would be the Smith family and so that could reduce the number that has to be sent and, um, he assured me that everyone would get at least one and some people would get, like, two to three depending on if they were in the targeted groups.

Q. Who obtained the lists for the mailing?

A. Dan had lists already. I got my own voter lists when me and Sarah were doing the signatures and the fivers so that we could look for Greens on the list. I got my own from the Town Clerks, um, but Dan has his own mailing lists that he uses; that he's acquired from other candidates.

Q. Do you know his sources?

A. Um, I don't know; I think maybe one he got from maybe doing Mendros for Congress or something. And I don't know probably lists he acquired with his work with John Michael. Just mailing lists, I don't know.

Q. You listed, ah, or there is listed, on this same report that you have in front of you; Exhibit #6. A payment to Dan Rogers for \$65 for expenses; do you know what that was for?

A. No, but I probably had a receipt at one point for it. I might still have it.

Q. Do you recall him coming to you and asking to be paid for expenses?

A. Um, yeah, I think he came and was like I had to buy this, this, and this; it was probably, like, ink cartridges or I don't know, something like that.

Q. The next line on the report below his name there lists a Margaret Larlee...

A. Uh huh.

Q. Do you know who that is?

A. That's my mom.

Q. Okay and what does she do?

A. My mom did, made the stencil for the big sign we had big, not hard board; hard board signs and, um, she made the stencil because I couldn't figure out how to like, you know, make the letters blow up on, big enough and print them out. And then, like, she does stuff like that for a living; she made stencils and um designed airplanes and stuff. And so I tried to do it and I couldn't and so I paid her to do it. And it took her, like, you know, a couple of days; she used an exact-o knife and she reverse drew...I don't know. She would like scribble with pencil and then flip it over...I don't know...she did a bunch of art stuff. But that's what she does for a living so it makes sense...

Q. The next listing is for AOL internet services; what did you...what was that for?

A. Research. Research into, um, dairy farms problems, problems with farmers, agricultural reports, research into state laws; I researched a whole bunch of stuff.

Q. What did you use that for in the campaign?

A. In the campaign? Um, well there were like statistics; I developed a whole bunch of statistics and Dan put them on the mail. I know there was a *lot* of statistics about dairy farms and how, like, they're going out of business and they're gonna be extinct in ten years. Sarah's family, they're dairy farmers so, you know.

Q. So you think that was used on the postcards?

A. Huh?

Q. You think that was information you used on the postcards?

A. Ah, no it wasn't.

Q. And the next listing is for Aaron Fuda...

A. Uh huh.

Q. \$750...

A. Uh huh.

Q. Who is Aaron Fuda?

A. Aaron Fuda is, ah, the kingpin hippie; basically for the state of Maine. Well, some people call him that; he's very modest and probably wouldn't like me calling him that. But basically that's what he is; he's, like, you know, rock star hippie guy. He's, ah, instrumental in organizing marijuana activism, and all kinds of grass roots stuff. He's organized many political rallies, a whole bunch of stuff; he has many connections. He

gave me a mailing list, um, of, you know, marijuana supporters. He allowed us to, um, campaign at his parties where there were many people from, you know, there's a lot of people. They weren't all from Minot, Hebron, Turner, but a good chunk of them were. So, like, all the Greens, all the registered Greens that Sarah and I couldn't find because they lived on roads that we didn't dare take that car down. You know, like, those people, he got them out to vote, you know, he's...so. And I got a mailing list of marijuana supporters.

Q. What did you use the mailing list for?

A. Um, I gave it to Dan and he said that we were going to send them...put on their mail, the people on the list when they got the mail it would say something like support medical marijuana and industrial hemp or something like that.

Q. Did you see that text on the postcard?

A. Um, on some of them I think, yeah.

Q. How did you or Mr. Fuda arrive at \$750 as the price to be paid...?

A. Well, the list was, like, 7,000; it was a crazy big list compiled over a long period of time. And Dan told me that if you go on the internet and look, the names...like...like, if you want to buy a list of names...say you're AOL and you want a list of names, like, typically they cost 10 cents a name. And that if they are, if they're, like...and that's just for random names and addresses that are valid and if they're, like, identified, um, that they cost more. And so, I don't know, I, I figured that was what the list and stuff was right.

Q. So the list included a number of names of people that lived in the district that Sarah Trundy was running for, correct?

A. Right, it also included a lot of names that weren't in the district.

Q. Did you pay for just names of people in the district?

A. No; for the whole thing. He did not want to go through it and stuff; he was just, like, here. He's not big on computers.

Q. How about the US postal service expenditure for \$111 just below that on the report?

A. It looks like stamps.

Q. Well, do you know what it was used for?

A. Stamps.

Q. For what purpose?

A. Um...I assume they went on mail.

Q. But you don't know...?

A. I don't remember specifically...

Q. Who else was working on the campaign besides you and Mr. Rogers?

A. Um...Justin, my brother's friend...

Q. Justin York?

A. Justin York, yep. Um...Kyle, my brother's friend.

Q. Kyle Corcoran?

A. Yep.

Q. They are both listed on the next page; Kyle Corcoran for \$40 and Justin York for \$55. That would have been for the work you are saying they did for the campaign?

A. Yes. Justin painted signs and did a poll and Kyle wrote an article on...um...for youth voting to try to encourage youths turn-out for the stuff that was gonna get set to the under 25 age bracket.

Q. And where did that article go?

A. I gave it to Dan and he made mail out of it.

Q. So the only people who would have actually put postage on something and mailed would either be you or Mr. Rogers?

A. Right. I remember doing some of them, I don't know if I did all of them. I remember you know, wanting to put stamps on mail, but I don't remember which mail it was or the date or...I dunno, I just know....

Q. Did you know....

A. That I put a bunch on.

Q. Okay. On the same page that has Mr. Kyle Corcoran on it and Justin York's names on there...

A. Uh huh.

Q. You have \$50 for expenses paid to you; do you know what that was for?

A. No, I don't remember what it was for exactly; ah...if I put that on there I'm sure I had a receipt for it.

Q. But that's one of the receipts you don't have anymore?

A. I had four receipts; you guys have them, they're in that folder.

Q. How about the Wal-Mart and Home Depot listings; what was purchased at those...?

A. Those might be, um, in there. I know some of them...

Q. Okay, there's a Wal-Mart receipt in here for...

A. I have a list in there and I have checked off what the receipts go to. Top four have checks on my little list.

Q. Here's the list right here...

A. Yep, those top four that have checks; those are the ones I have receipts for. I know it ain't very much but...

Q. These are...this is the list you're referring to and these are four, the four receipts you are referring to?

A. Yep.

Q. I'm going to make a copy of these just so the record is clear what we are talking about.

A. Okay.



Q. Did the campaign...there's a listing on the next report; Trundy #7. The Brown Fox Printing for \$136.50 for signs...

A. They made little signs.

Q. The small signs?

A. Yes.

Q. And what were they used for?

A. Put out. Ah, those were the ones we surrounded the public with. We scattered the big ones throughout the district; did the intersection. And those are the ones...those are, like, election-day signs. Like you, like, everybody gets sick of seeing, like, the same signs for, like, a month. And you know, when the signs first come out and everybody is looking at them and little kids are, like, "mommy I like that one; it's pretty." So we figured if, like, on election-day we put out all new slew of signs, like, different looking kind of, but still the same theme that it gets peoples attention. And you know...voting day, and we also surrounded the polls with them.

Q. What time...did the campaign do any advertising?

A. Ah, no, we did a lot of, like, word of mouth. You know...I think Aaron Fuda probably, you know, was very instrumental in advertising the fact that there was somebody to vote for out there.

Q. Did you purchase any equipment for the campaign?

A. Um, yeah we got ink cartridges; those ran out. We got, like, a, one of the Wal-Mart things, the big gray Lexmark type printer; Dan killed it. It's dead, so I got rid of it.

Q. The, um...Sarah Trundy...testified earlier that she didn't really do much in the campaigning.

A. Right.

Q. That she wasn't too involved in the campaign?

A. Right; we went out a couple of times. I would go over and I'd be, like, Sarah I need an update for your campaign and she'd be, like, whatever, I thought you were dealing with it, I don't want to deal with it. Except for one day she did let me go through all the candidate questionnaires with her and we went through and I asked her her opinion on, you know, what they were talking about; like, the questions, I was, like, okay what do you think about this question, what do you think about that. So that I made sure that all of her views were accurately represented. And I know that she filled out, the only thing that she was interested in out of the questionnaires was the Gun Owners of America one. Um, she agreed with everything with it; I remember that much and I know we did some other ones like, um, Alliances and there were a whole bunch of questionnaires and, um, we went through them and the only one she cared about was the Gun Owners one.

Q. Doesn't it strike you as a little bit unusual to have a campaign with the candidate is unwilling to campaign?

A. Well at first she was. At first, I mean she helped me get signatures to get herself on the ballot, you know. And I asked her, I made sure, I said "Sarah if you win will you serve?" And she said yes, I will serve if I win. But I think, I don't know, she just got, like, all shy about it, you know. I brought Ben Chipman up there; he wanted to meet with

every single Green candidate in the , ah, you know, in the state. He made sure he met with all of them at least once, you know, and she didn't want to talk politics; we went four-wheeling. And Ben got his shiny shoes all muddy. And, um...then like I know she would, like, receive things in the mail and just throw them away because she just assumed that I had a copy of them too, which I was going to have, like, all the mail was going to come to me, she said I don't care just do it because I don't want to think about it and I want to work. You know, that's the way she said it was. And, ah, but, like, I didn't receive all the mail because when I came in I, for the mailing address, for the physical address I had her address and then for mailing address I had my address and then somebody in this office was, like, you have to put her address. So therefore I did not receive any of the media announcements or anything and she assumed I was taking care of it all and so she threw it all away and subsequently she did not have a candidate profile in the Sun Journal. She was, like, one of the only two people in the state who did not have a candidate profile and, ah, I was kind of disappointed about that. I called her and said dude you gotta tell me when you get this stuff. And she's, like, "well you said you'd get a copy too..." and so that didn't happen but I mean she still did very well I think considering all of that...I mean she came in ahead of a Democrat in the town of Minot which is Republican town so that's kind of cool. That's just 'cuz she knows everyone I guess.

Q. Um, we have here a statement or a letter to People's Bank requesting authorization to obtain a copy of the bank statements and canceled checks...

A. I called them, um, and I ordered all copies for this thing, and I called them and they already, I paid them money to get those records but they haven't mailed them to me. Maybe you guys got them I don't know.

Q. Um, well they could probably be if you're willing to sign that as well as Ms. Trundy they might be able to send records directly to you.

A. Well they've ordered them for me because I called, like, when I got this.

Q. Okay, I think we'll switch topics for now.

A. Am I gonna get fined 'cuz I couldn't find all the receipts?

Q. Ah, the, this is today the opportunity for the Commission to process a list of information from you and from others, um, what the Commission finds based on that...

A. Now if you decide to fine me, you would fine me and not Sarah Trundy, right? For losing receipts because that was not her fault.

Q. It's really premature to be discussing that but you would have an opportunity to speak to the Commission regarding any actions taken.

A. Okay, but I will keep looking for them!

Q. Okay, I appreciate that.

Q. I'd like to show you, ah, another document not having to do with Ms. Trundy's campaign. Back to St. James...

A. This isn't St. James.

Q. Well that's just the label on the sticker.

A. St. James 16. Yep.

Q. Do you recognize that document?

A. Yes I do.

Q. And what is it?

A. That was sent out on Biddeford election.

Q. And were you involved in the preparation of...excuse me.*(tape ran out)* We were speaking about Exhibit 16, or St. James 16; can you tell me whether you were involved in the preparation of that piece of campaign literature?

A. Can I plead the 5<sup>th</sup> Amendment if I didn't break a law?

Q. It's your choice...

A. Oh, well I plead the 5<sup>th</sup> on that question.

Q. Okay. Do you know who was involved in the preparing of that literature?

A. Yeah.

Q. Are you prepared to tell us who was involved?

A. Ah, um, I watched Dan Rogers make that on his computer.

Q. And, do you know, um, did he print it on the computer?

A. Yes.

Q. So it wasn't taken to a print shop...

A. No.

Q. As far as you know?

A. Oh, right, it was taken to Kinko's in Auburn.

Q. And this was prior to the February 2004 special election?

A. Correct.

Q. At the time, and you said you had been involved in that special election.

A. Uh huh.

Q. Um, which candidate were you assisting in that campaign?

A. Dorothy Lafortune, who had absolutely no idea about anything having to do with this mailing.

Q. Okay. Did anyone in connection with the Lafortune campaign have any idea about this mailing at all to your knowledge?

A. No.

Q. So it was just you and Dan Rogers?

A. Ah, Dan Rogers knew about it and I plead the 5<sup>th</sup> on the other question.

Q. Do you know what it cost to print?

A. Um...I don't know. The whole thing cost less than \$50, I know that.

Q. How do you know that?

A. Because Dan showed me a law on the internet that said if you do not spend more than \$50 on an independent expenditure it does not have to be reported.

Q. Um, the top left of that mailer says Coalition for the Homosexual Marriage in Maine, correct?

A. Uh huh.

Q. Is that a real organization to your knowledge?

A. It's Dan's organization.

Q. Is it fiction or reality?

A. Um...I don't know. I believe it's made up but I don't know. I think Dan has strong views concerning gay marriage so technically he could himself that I guess.

Q. Are you familiar with the requirements for attributing to who has paid for and authorized the campaign mailings through your campaign?

A. What?

Q. Are you familiar with the requirements when you do a campaign mailing for what you have indicated and whether the candidate or someone else paid for or authorized you to do so?

A. I know...you have to report it unless you don't spend \$50 or more.

Q. But what about on the text of the mailing itself? What's your understanding of the requirements, what you have to say, on a mailing about who it was...?

A. Paid for by.

Q. About who it was paid for by...

A. It has been paid for by The People to Elect George Bush or whatever.

Q. And if it has been authorized or not authorized by the candidate, correct?

A. I didn't know that. I know it had to say paid for by; I didn't know it had to say authorized by.

Q. Do you know how that mailing was distributed?

A. Yep.

Q. How was it?

A. It, um...was sent to...Dan took Ben's list, Ben Chipman's list without him knowing, and it was sent to all of Stephen...Ben had done a phone poll and people who said yes I am most definitely voting for Stephen Beaudette were marked as a 4. People who said yes I'm most definitely voting for Dorothy Lafortune were marked as a 3, I mean as a 1. And it was sent...it was sent to people who were hard-core Stephen Beaudette supporters; and his family and his neighbors so that he would think that the entire world had received it when in reality only fifty people did or something like that.

Q. Was it mailed...?

A. From a post office box in Portland.

Q. In Portland?

A. Yep.

Q. And was that in February or January of 2004? Do you know how far ahead of the elections it was mailed out?

A. I think it hit the box on election-day.

Q. Were any of the candidates in that special election, um, aware of who prepared this mailing?

A. No.

Q. Do you believe that you're the only other person besides Mr. Rogers who is aware of the origin of this mailing?

A. And Julia. Julia St. James.

Q. And how did she become aware of it?

A. Um, I think Dan told her and then she stole his so that, you know, if she decided she was gonna go all stupid on her campaign she could...I don't know...maybe give it to you guys and think she'd get herself out of shit or something, I dunno. She told me that she took this so that she could use it as black mail against Dan if Dan ever double crossed her. And I said I don't care, have it, you know. And I don't know, so there it is.

Q. So you didn't give that to her?

A. I did not give that to Julia, no.

Q. Were you there when Dan handed it to her?

A. I...don't know I may have been; I don't recall. I was most likely drunk or something.

Q. Okay.

At this point the director took over.

Q. So the total cost of this would have been...?

A. Thirty bucks maybe, I don't know. Roughly, I don't know.

Q. First there would have been cost of the postage plus the Kinko's copying fee?

A. Right, I did not pay for postage.

Q. Just based on your experience with campaigns do you have any idea how much postage would be for one of those?

A. Ah...I don't know; thirty-seven cents?

Q. And I'm sorry, how many did you say had been created?

A. Not many; maybe, like, 50 or 60, something like that.

Q. And did Ben Chipman know that this had been created?

A. No.

Q. Did Ben Meiklejohn know that that had been created?

A. No, he wasn't even there. He wasn't anywhere's near...

Q. Was Ben there? Ben Chipman?

A. Yeah, Ben Chipman was there. He...

Q. When you say there, what do you mean?

A. Oh, he wasn't in Biddeford on election-day.

Q. Were any of them mailed from outside Maine?

A. No.

Q. Were any of them mailed from Florida?

A. No.

Q. Does Dorothy Lafortune have any connections in Florida that you know of?

A. Yeah. I think that she ran away to Florida after, um, when, when her campaign was all done and they were being investigated for like, ah, being bullies to absentee ballot people. I, I don't know, I heard something about how she went to Florida or something.

Q. Do you think the Kinko's charge was included in the campaign finance reports for the campaign?

A. No.

Q. Do you believe it wasn't?

A. Of course it wasn't.

Q. And the postage; was that included in the campaign finance reports of the campaign?

A. No, nobody was aware of it.

Counsel Gardiner then took over the questioning.

Q. Let's turn to your involvement in the Julia St. James campaign of 2004.

A. Uh huh.

Q. How did you know Julia St. James before the campaign?

A. I didn't really know her, she was my aunt Cathy's best friend.

Q. Is that Cathy Welanski?

A. Lelansky.

Q. Lelansky; how do you spell that?

A. L-E-L-A-N-S-K-Y

Q. Thank you.

Q. And she lives in Minot as well?

A. No, she lives in Turner.

Q. Did you encourage Julia St. James to run as a candidate?

A. Julia asked me if she could run. I was on the phone with my aunt Cathy and she was, like, what are you up to and I told her that I wanted to start a new political party called the Fourth Branch that would overtake the Libertarian party because nobody ever takes the Libertarian party serious because, you know, they spend more time sitting around arguing whether or not heroin should be legal and they make fools of themselves. Therefore people it, you know, people don't ever really see the true arguments of the Libertarian party such as constitutional rights and stuff which I think are very important and so I wanted...AND that I get, you know, email from like Republican organizations promoting Libertarian events it makes me think that, like, the Libertarian party is owned by Republicans and that's why they look like a bunch of fools...I don't know, that's what I thou...anyway I told my aunt Cathy that I wanted to start my own political party. And, um, Julia said "I want to do it! I want to do it! I want to do it!" And so I said okay, I guess you can. Because my aunt Cathy was like her husband had a good job and she's, like, you know, forty-something and she's a small business owner so, like, she's a good candidate. And, um, I knew about her marijuana charges and I didn't care. So I told her I would help her run.

Q. And what happened after that phone...first of all, when did that phone call take place or where were you and where was she when that phone call was placed?

A. I don't know, I was on the phone.

Q. Do you know when?

A. I don't know whose phone, I don't know what phone; I know I was on the phone with my aunt Cathy and then Julia got on the phone and was, like, "I wanna do..." I had only met her, like, once before, maybe twice, probably just once.

Q. Did you have a following meeting with her after that phone call?

A. Yep, I went to her house.

Q. Anyone else with you?

A. Dan was with me. Uh huh.

Q. And what did you discuss?

A. Um, her running and Fourth Branch and why she wanted to run. She said she wanted to run because she thought it would help her look more credible and stuff when she went to court for her, ah, marijuana charges and she also said she was mad because the warrant that they got against her. A police officer, Chancey Libby, snuck on to her private driveway and heard a fan blowing in a greenhouse and somehow used that to obtain a warrant. Um, she feels that her fourth amendment rights were violated and, you know, she wanted to scream about that too.

Q. And who suggested what office she might run for?

A. Dan, I think.

Q. What did he tell her about why she might want to run for that office?

A. She wanted to run the second she heard me talking about it. She said "I wanna do it, I wanna do it!"

Q. So she wanted to run for legislature, could be either the house or senate people, correct? If she wanted to just run...

A. I think at one point I told her, like, you know, she could also run for that and I think she was like "fuck that, if I'm doing it I'm going all the way" or I dunno.

Chair Ginn Marvin.

CGM. Ms. Larlee, I need to ask you to watch your language please.

JL. That was a quote.

CGM. It's not acceptable.

JL. That was a quote though. I, I, I won't though, sorry.

Counsel Gardiner.

Q. Did, what, did you discuss with Julia St. James that day running a Clean Elections Act campaign?

A. Uh huh.

Q. And did you tell her what amount of funding that might produce the campaign?

A. Yep, I said, I think I told her how it worked. The whole thing; you go get your signatures, and you get your five dollars and you get this much.

Q. And how much did you tell her she might get?

A. Like, seventeen...seventeen thousand.

Q. And did you tell her what you thought she might get from matching funds?

A. Um...no, I did not.

Q. Did Dan?

A. Dan said something, like, it was a highly targeted race and so there may be matching funds.

Q. What else did you discuss in that first meeting with her?

A. Ah, I don't really remember. That first day or whatever...oh, I know, okay the first time I ever went to Julia's house I drove up the road and...she was, um, posting her land with orange triangles because she said it was a Wiccan ritual of protection. Yes and, ah, so, I dunno...I thought she was nuts.



Q. Did you discuss campaign strategy then or, if it was then or the next meeting, did you have discussions with Julia St. James and Dan Rogers about what her campaign strategy would be?

A. Yes.

Q. And what was the campaign strategy?

A. Well...um...it was to develop a party platform for this thing called the Fourth Branch or, like, a doctrine or a dogma of sorts, um, to give, give the people a clear outline of you know, issues that are not really brought to life in main stream politics.

Q. But what was the strategy for, what did you plan to do in the campaign in terms of advertising, mailings, um, door-to-door campaigns; that kind of strategy. How were you going to get Julia St. James elected?

A. Um...Dan thought that we should just try to, um, slam Senator Bruce Bryant as hard as possible and try to take as many votes from him, which I thought was stupid because Julia was, like, pro-gun and, you know, pro-rights and she was pretty right-winged. I mean, she basically took a libertarian platform and gave it another name. And so I was thinking, you know, she would receive more votes from conservative people as opposed to Democrats who wouldn't vote for a libertarian; they'd vote for a green maybe, but not libertarian liberals. Um, but, I dunno, Dan had some thing in his head of why it would work and I dunno.

Q. She had no prior experience to campaigning, right?

A. Correct. But she said she had always wanted to be a marijuana activist her whole life.

Q. Why did you and or Dan Rogers think she would make a good candidate for the Senate?

A. Um, because she was good at public speaking, because she was a small business owner, because, you know, her husband like had, like, a credible job; he was some, like, executive person. My aunt Cathy told me that she was, like, cool and stuff and that people liked her and she was all, like, mature and stuff; that's what I thought.

Q. Did you have discussions with her about what you and Dan Rogers would do for her campaign?

A. Um, I had discussions about what *I* would do.

Q. And what were those?

A. My job was to develop a newsletter and to be treasurer. I was also supposed to help her go do doors and coach her on talking about politics and stuff to people. Basically be with her when doing doors in case somebody asked her a question that she couldn't answer. And...you know, that didn't have to do with marijuana or gun rights or any of those things that she was passionate about. Um...she never wanted to go do doors; she would say "no honey we'll do it next time or something." I had some problems with Julia on the campaign. Ah, very early on in the campaign, I was treasurer at first for...and there was an expenditure to Dan Rogers for \$5,000; I received half of it, or roughly half of it. I received the equivalent of \$100 a week. And I received it all at once

because I'm on Section 8 and when my income goes up my rent goes up. And I was, like, well if I'm going to be working on campaigns my rents gonna go up so I took all the money I got and I dumped it into rent and, you know, I've would have...my child support and my house-keeping wages.

Q. So you got \$2,500 of that...?

A. Yes, and that's why I received that all at once because it just was all gonna go to rent anyways 'cuz my rent went up. And I did not want to receive more money because then I would no longer be eligible for the Section 8 program and I knew that after election-day I would have no income so.

Q. How was the \$5,000 arrived at as the total fee?

A. Um...I dunno.

Q. Did Dan Rogers suggest that figure?

A. I think so, yeah.

Q. And what did...

A. I knew that I could not make more than \$100 a week or I would not be eligible to stay on the Section 8 program and I wasn't willing to let that happen because, you know, this isn't like a permanent career or anything.

Q. Did you and Dan Rogers have discussions about what you would charge the campaign for your combined services?

A. I don't know. Probably, I don't know.

Q. But the agreement to get that, get half of the \$5,000 was something you worked out with Dan Rogers?

A. Um...I think I was more concerned with Section 8 and I thought that, you know, \$100 a week was modest so that's what I...yeah. I dunno, he probably said...I dunno, he probably said, I don't remember, but knowing Dan he probably said something like, "is a \$100 a week good?" And I was, like, okay sure.

Q. Were you part of any discussion with Dan Rogers and Julia St. James about what she would say the two of you did for work on the campaign?

A. I don't remember. I remember a lot of things, but some of them I don't know.

Q. Were you there when you, did you go along to open the bank account for the campaign?

A. Yes I did.

Q. And who else was there?

A. Dan drove us.

Q. You and Julia St. James?

A. Uh huh.

Q. And did you expect to be the one with authority to write checks as in the Sarah Trundy campaign?

A. Yeah, that's what Julia said would happen.

Q. And what did happen?

A. She said no you're gonna steal my money; you're not being honest. And so I wasn't on it.

Q. And so who had check-writing authority?

A. Julia.

Q. And only Julia?

A. And only Julia, yes.

Q. And was any cash withdrawn at the time the bank account was opened?

A. No.

Q. When did you first receive any money for this campaign?

A. Um, it was like, not long after she got ah, it was like not long after she got the money. It was like at the beginning.

Q. After she got money for the Clean Election campaign? Is that what you're talking about?

A. Yeah. And then I got, either like \$2,300 or \$2,500 hundred or something like that and I dumped it all into rent and that's it.

Q. Did you receive any other payments from the campaign other than that \$2,500?

A. Um, it says that I received \$230 or something like that. I don't remember what that was for. I almost think that it's money that Dan said Julia needed to reimburse him for something and he didn't have an idea. So it had to be written to me or something like that, but I know I was paid like \$100 a week. I'm not sure how long the campaign lasted so I'm not sure what that totals up to.

Q. And you were paid by Dan Rogers, correct?

A. Julia wrote the check to him.

Q. And he wrote, but the \$100 per week he gave...?

A. He gave to me.

Q. I'm going to show you copies of the canceled checks from the campaign bank account. You don't have any recollection of what this...I believe it was a \$271. Okay, here it is. On the canceled checks....

A. I know. I don't remember.

Q. Canceled checks...?

A. What does it say it's for?

Q. There's two canceled checks: one to you and one to Dan Rogers on that page.

A. I don't know.

Q. Do you recall receiving that check?

A. Um, I think so. I think Dan told Julia to write it to me, but I don't know why and I don't remember what it's for. And I don't even know if I got the money. I don't know.

Q. You're not sure if you received it?

A. No, I think that was supposed to be like. Dan didn't have an idea so it was supposed to be written to me or something like that.

Q. He was written a check about the same time?

A. Well, maybe he...that happened at a different time. I dunno. I don't remember. I saw that on there and I thought it was stupid that I was listed as receiving like \$200 whatever when I got \$2,500 for however many weeks.

Q. So your recollection is that the total amount you were paid for the campaign, for your work in the campaign, was \$2,500 is that correct?

A. Or a \$100 a week. I don't know how many weeks the campaign went.

Q. But you said you were paid in one lump sum.

A. Yeah.

Q. And that....

A. It was like( \$)2,300, (\$)2,400, or (\$)2,500. I can't remember. I don't remember how many weeks it was and so I don't know.

Q. What did you actually do for the campaign?

A. Um, I made a newsletter that you guys have. I did not write all of it.

Q. And that is exhibit 13; is that the newsletter?

A. Yes.

Q. What portions of it did you write?

A. Um, I made this.

Q. First article on the second page? The article on the second page?

A. Yes. I developed like you know. I did this with the input of Julia. Basically for a long time when I was up there I would go up there with my laptop and I would sit there and ask Julia questions about what she thought about stuff. And write it down and then you know, basically it was my job to make it sound a lot prettier than how it came out of her mouth. Um, (*quoting part of another article*, see this is Julia. Yeah, I like wrote this but I asked her questions you know. There are a lot of things that Julia wrote herself that I edited and made proper sentence structure and stuff. I did not write this.

Q. Which page are you on?

A. Why we shouldn't....

Q. Page 4?

A. We shouldn't re-elect Bruce Bryant to Maine Senate. I did not write that. Dan had wrote that. This one about the big checks. I did not title that. Dan titled that, but I did write this one. Um, I found this.

Q. You're on page 5 now?

A. Yep, on page 5. I found this on the internet. I thought it was, um, relevant to the district. I wrote this about Fibromyalgia in the district. I had nothing to do with this Tax Cap stuff.

Q. And that's on page?

A. On page six. Um, I did not write this. I did this little thing here about the....

Q. Number 7?

A. Yep, I did herbal remedies and the poll. And all this I wrote with the assistance of Julia.

Q. On the back page?

A. Right.

Q. And who laid out the newsletter?

A. Dan did the layout.

Q. During what period of time did you do your work on the newsletter?

A. All through. I had a lot of things that didn't get in to this newsletter that I had written. I don't even remember what they were about. One of them was about the Sportsman Alliance not wanting to have, like wanting to completely abolish the whole referendum process because they were mad over one little bear-baiting referendum. And how you know, like we couldn't allow people to mess with the referendum process because it was an outlet for people. So, like, I had, I had a letter about that. You know it was a battle that was going on in Augusta or something at the time. Um, I read the Sportsman Alliance questionnaire that Julia had received and they were all like will you support you know, making it illegal to collect signatures at like polling places and stuff like that. And I learn the referendum process and so I wrote an article about that. That did not get in there. There was some other things. I dunno. My laptop got stolen, pirated, not stolen. It was given back to me minus my chip.

Q. When did you finish your work on the newsletter?

A. Um, I was just about, I mean, by the end of the campaign I was pretty much done. You know, I had a lot, a lot of stuff going on.

Q. By the end of the campaign?

A. Yeah.

Q. Do you recall ah discussions with Julia St. James and Dan Rogers that there would be three newsletters produced for the campaign?

A. I think I remember hearing something about it. I don't know. I think it was like a tentative thing. I don't know. I remember hearing something about it but I don't remember any of the details. I know, I know I wanted to do as many things as possible because I wanted to write a whole bunch of stuff and then I wanted to get a job as a reporter.

Q. Did you, when you finished writing for newsletter, did you hand your material over to Dan Rogers?

A. Um, it was all in like, computers, different computers.

Q. Well did you?

A. Yeah, yeah. I gave it all to him so he could put it into PageMaker. I don't know how to use PageMaker.

Q. Was it Dan's decision when to compile it as a newsletter? If you were working on it throughout all the time you were working on the campaign did you ever have discussions with him about when you should we get this newsletter out?

A. Um, yeah. He kept saying that he would do it, he would do it, he would do it and he procrastinated until like last minute, but he did it.

Q. Did you ah, recall agreeing to um, keep notes of ah, door-to-door when you went door-to-door of points that um, that...?

A. Yes, I did that. I did that and then Julia didn't want to do doors. After we were done the initial process of getting her qualifying signatures and stuff, um, which we did lots of doors. Then she didn't want to do doors anymore. And she just would be like: "*Oh honey, we don't have to do it this time.*" I don't know. She didn't want to go do doors when I asked her if she wanted to go do doors. Every time I wanted to do doors she didn't want to do doors. I would drive like all the way from Minot to Hartford to go help her do doors. I'd be like come on, put your damn dress on, we're going out. Sorry. And um, she was like, no, no, I don't wanna do it.

Q. How many days, on how many occasions did you go out and ask her to do door-to-doors with you and she would not?

A. Like five, probably, roughly, hand-full.

Q. Um, were you involved in creating any signs for the campaign?

A. Um, yep, I went up for a day and I painted signs with this boy named Arthur. Blue. I don't know, either I rolled them with blue the base coat, or I...I don't think I spray painted. I think I had blue rollers.

Q. What else did you do for the campaign?

A. Um I wrote Julia's speech that she gave when she opened for Ralph Nadar. Um...

Q. When was that? I'm sorry. When was that?

A. Ah, I don't know. There's a picture in here. I don't know if there's a date. I don't know when the date was but I know....yeah. Ralph Nadar was giving. He was doing a speech at a place in Portland, Center for Cultural Exchange. And, ah, Dan managed to get it so Julia could open for Nadar and I wrote that speech. Um, I also typed a list of supporters and like, you know, if we went to a house and somebody was like, "No I don't see." Like okay, somebody told us we should ban pigs because they were the cause of influenza or something, you know. And I wrote it down. Somebody said that, "Well I would give you \$5 but this money order is from Wal-Mart and I hate Wal-Mart so I won't." So I'd write: guy who lives in tree hates Wal-Mart. Um, I kept a list like that.

Q. Did you give it to the candidate?

A. Um, I, I don't know. I don't know. I don't know where it is anymore. I had it in the beginning and it probably ended up at Julia's if I didn't have it. So, I did refer to the list for signs. I remember I referred to the list for signs and I was like, well, "Remember this guy?". You know, there was a man we called Engine Ed you know, and I was like we gotta go put a sign on his lawn. You know, all of her signs were getting stolen off the sides of the road. You know, we put them up all down a road in Buckfield and you go the next day and every single one of them was gone. So, I was like, you know, we gotta get them on people's lawns where they can't get stolen, you know. And so like, I would want.... There were people who were extremely supportive of Julia that I had met with Julia and these people would have gone and put signs up for her. They would have done lit drops for her. They would have done a lot of things. And anyone who I suggested going to see, she'd be like, "No, he's a creep, no he's a child molester." And she would think up all these reasons of why we couldn't go see these people, why we could only go see the people that you know. And she had to have everything and I think it was almost because I thought of it that she didn't want to do it. You know, she was very extremely catty to me. Every guy I brought up there she hit on. Um, she kicked me out. There was that boy named Arthur that I painted signs with. I thought he was cute and she knew I liked him. And so the next time he was up there, um, I wasn't allowed to come, you know. Stuff like that. So, you know, towards, by the end of the campaign I was a bit disgusted and I was like you know. I was paid \$100 a week on making this newsletter. She doesn't want me to do any of the other stuff, so I'm not. I made a newsletter. I did it to the best of my ability.

Q. Were you paid in cash or check?

A. Cash.

Q. How long was the speech that you wrote, that you had written for her?

A. Um, I believe it was an eight-minute, a standard eight-minute speech like the kind I learned how to write in public speaking class. Julia said no. Okay, I tried to start this whole, like, speech process a week before she was supposed to give the speech. Um, when I was in public speaking class, you're supposed to memorize the speech before you give it because when you get up there you get like nervous and stuff and forget and so you have to have the whole thing memorized. I was going to, you know, have her do the speech in front of me and be like okay, stop wiggling your foot, stop saying um, ah, stop saying ah, you know. All those public speaking mistakes that everybody makes at first. And I was going to coach her and drill her and she was like, "No, I don't need your help you little brat, what's wrong with your dress, why do you have your hair like that?" And she just basically blew me off. Um, she did end up, like I wrote the speech for her anyway. And I was like here, read this, read this, read this and she read it and she was like, "I don't need that. I can get up and I can speak for hours about nothing to millions of people because I'm a good speaker." You know, and when like she got up there, I could see that she got nervous and she stuttered and she used a lot of the lines that I had written even though she replaced words like, word like incumbent with opponent and stuff because she didn't have it memorized like I told her she needed to.

Q. How much time did you spend on the speech?

A. Ah, I dunno. I think I had like a weeks notice. A weeks notice before....

Q. But you don't recall how many minutes or hours you spent?

A. No. I remember being at Julia's house and wanted to start it and arguing with her about why she needed to memorize it and have it done *before* she got to Nadar's.

Q. Where did you, um, where did you do campaign work? Out of her house, or your house or a campaign office?

A. Both. I did, um, you know, when I didn't want to go up there anymore, I wasn't too fond of her anymore. Um, I was just like you know, I just wanna be done with this whole thing. I'll write this newsletter and you know. Then I just stayed home and worked on the laptop except for the Nadar thing. Then I went up there.

Q. Did you ever go to a campaign office that wasn't located in the house?

A. Nope.

Q. In her house?

A. Nope.

Q. Are you aware whether there was a campaign office?

A. Um, I worked on my laptop at Julia's house and I worked on my laptop at my house. Julia's greenhouse...we worked out there some. Julia's driveway...we worked out there.

Q. But you never worked in a location in Wilton for the campaign?

A. A location in Wilton?

Q. Uh huh.

A. Um, no. Julia did have a flower shop in Wilton that she was going to open. She had a flower shop in Wilton Maine. All of a sudden she's opening a flower shop. So I went there to see it with her and she had um, big, like poster board artwork that she was gonna sell. And she had a refrigerator.

Q. Thank you and I don't need to hear a description. I'm trying to save some time. Did you have anything to do with the campaign acquiring a digital camera?

A. Um, I think I was with her when she bought it. And I do believe that there was a digital camera stolen from my car at the Wal-Mart parking lot. And then I think she had to buy another one or something.

Q. And you know that was the....you were there when she bought the camera?

A. I think so. I don't know. I know that I was there when we bought matching folders.

Q. Well, I just want to ask you about the camera.

A. I don't remember if the camera was included that day.

Q. Well....

A. But I do know that the digital camera ended up in my car and it was stolen from my car at Wal-Mart parking lot, or in downtown Lewiston, or.... I don't know. It disappeared, was stolen from my possession. And so I told her and I think she may have gotten a new one. I'm not sure.

Q. Was anything else stolen from your car?



A. Not that I noticed.

Q. Did you use the camera?

A. No! It got stolen like before we even got to use it. I did take pictures of her for her mail in her greenhouse and I remember I was using like, you know, it wasn't a digital camera. It was a camera with "turney lens things."

Q. Were you um, ah, aware of Dan Rogers being paid for work on the campaign after the initial \$5,000 payment?

A. Ummm, yeah, I think so. I think I told Julia she was stupid for doing that.

Q. Were you aware that he received another \$3,000 on another occasion?

A. I know that he received money for a postcard. He is like (\$25, (\$2,000, (\$3,000, (\$2,500. I don't know. There was like this whole big thing where, um, Dan was at Julia's house overnight and like I kept calling and nobody would answer the phone. And then um, I got mad at them and then Julia like three weeks later or two. I don't know. Julia later on had said that day she had given Dan, um, some money to do a postcard of a cartoon that I had drawn. And she said that Dan had said that he wasn't going to do the mailing himself because he didn't have enough time. And so he was gonna pay some Republican friends of his to do it because they had the resources to do it. And um, I questioned whether or not it really went out because, um, it was a pretty controversial piece. And I think that if it had gone out there would have been a lot of angry people screaming in the newspapers and there was not a word about it in the newspapers. And so, um, I questioned whether or not Dan actually gave that money to Republicans to do a mail for him like he says.

Q. And how about, were you involved in any discussions about doing...?

A. And Julia told me that she thought he didn't send it out. And then I told her she was dumb for giving that to him.

Q. Were you involved in any discussions about doing automated phone calls for the campaign?

A. Automated phone calls? No, that's not my department. That would be something Dan would do. I write things mostly.

Q. Did you, did you observe or were you aware of Dan Rogers doing, um, work on a campaign other than the work he did to lay out the newsletter?

A. Um, he went up to Julia's without me a whole bunch of times.

Q. What did he actually do for the campaign, to your knowledge?

A. I...he designed the newsletter. There's the day he painted signs. He put up a lot of signs I think.

Q. You think, did you actually, were you with him when he put up these signs?

A. I don't know, you know. There came a time when I got sick of being called little girl and being mouthed at and I just didn't go up anymore.

Q. When was that? When did you actually stop going anywhere other than your own house to work on this campaign?

A. Um, I believe it was the day I brought my friend Brian up there and Julia acted inappropriately to him. He was my boyfriend. And she hit on him and I was like, I'm all done. I'll make you your newsletter you know. I'll write you your speech. I'll do what I said I was gonna do. I had already at this point resigned as treasurer. I resigned as treasurer very early on. Like I....

Q. Well, let me stop you for a second. When did you, when did you have that falling out with Julia that you just described and not return?

A. Well, there was a couple little ones and then there was a big one where I called her up and I um, called her mean names. And because they wouldn't answer the phone and, um, I was like, I was like hung-over or drunk or something I don't know. I was kind of mean. And I called her up and I left messages on her machine and I was like you either call me now. And so then they wouldn't call me back and I called her fat which made her cry which I felt bad about cuz I knew that was the one thing she was sensitive about. And that was kind of mean of me. Um, but this is like the whole thing. I think that Dan knew that um, I had taken drugs...k.... And I had come off the drugs and I was kind of irrational and I think Dan knew this and that's why he decided to go up to Julia's. And you know, like get us into a fight basically so that we wouldn't talk so that I wouldn't catch him with this whole like ah cartoon thing that he had made up some excuse about Republican's are gonna print it for us. I'm like yeah right. You know, and so I think that he, you know, that night he purposely got me and Julia fighting to.... That's what I think. I don't know. He's been manipulative of my mind in the past you know. He's told me. It's like, I tell him I don't want you around and he says, "Well you must have borderline personality disorders.... here's a list of the reasons why you have. I'll help you. I'll fix you."

Q. When did the...so after that phone call you were not going up to her house to work on her campaign?

A. No, I may have been up there like once or something.

Q. Did you work with Dan on the campaign at all after that?

A. Ah, no. Dan went up to Julia's without me. Ah, except for to make this, make this. I told him what I wanted for flowers and pictures and colors and stuff like that.

Q. Let me just show you, you were initially the treasurer for the campaign correct?

A. Yep.

Q. And exhibit 4A, is that your signature on the bottom of the page?

A. Yes.

Q. Did you prepare that report?

A. Nope. This is Dan's handwriting. But I did sign it and I did. I do know of these expenditures. The \$5,000 is the one that me and Dan basically like split. Even if I got

like 23(\$2,300) instead of whatever, I don't remember. And the other one was like um, the day me and her got matching folders. And I signed this one.

Q. And um, how did you come to resign as treasurer?

A. Um, I got to Julia's house and I looked on the table and there was a letter from Androscoggin Bank. It was a bank statement. And it was open and I was like Julia why don't you give me these things and she was like, "Oh....blah blah." I don't remember what she said. And, ah, I looked at it and there were expenditures that I did not recognize. And I said, "Julia, um, where are the receipts for this" and she was all trying to have...."don't worry about it, don't worry about it, ahhhh". You know, trying to make light of it, trying to blow me off. She's pretty good at blowing me off and being like oh you and you're silly hair and walking away. You know, and um, I didn't recognize them. And so I said you know what, I'm not signing your reports. You're not giving me receipts for these expenditures. I can't do my job as treasurer, I'm not signing your reports. And that she would have Rob, her ex-husband help her. And Rob was like Chief Financial officer of some company or whatever and so I figured Rob is probably more qualified than me anyway. I can't even add. So, and that was that.

Q. When did that occur, approximately what month?

A. Um, I don't know. It was the next expenditures after the ones I signed.

Q. Let me show you exhibit 8, which is the bank statements and canceled checks. Can you tell us what were the bank statements that you....?

A. Okay, wait.

Q. What I'm asking you is, can you tell from looking at the bank statements which was the first expenditure or which were the expenditures you had said I don't know about these and I'm not going to be treasurer?

A. Um, I recognize the \$5,000. This 32 (\$3,200) I don't know. I thought that there were only two things. Um, for some reason I remember the number 8, but I'm not sure. Oh, this statement, 8/10/04, seven debits, there was \$8,000 left. I think that sounds like this is the one I saw where it was like.... I remember something about 8,000 or 800 and I think this is it. And I was like you know there's \$8,000 out of \$17,000. I'm done with you. I'm not signing this.

Q. What's the date on that \$8,000 entry?

A. Ah, well it says this statement you balance at 8/10/04.

Q. Okay.

A. Is \$8,000.

Q. Did you um, what did you do with the receipts that you had from the campaign?

A. Um....

Q. What did you do with the receipts that you had from the campaign?

A. Um, well, at first when I had receipts.... I, um, I gave them. I had them. We had matching folders. I had a red one. She had a blue one. I had them in my folder and the pocket. There was lots of pockets. There was one pocket reserved for floppy disks. I had the receipts in that pocket and when I said I'm not being your treasurer anymore and

she said fine. She'll have Rob do it. I said okay, well. I'm putting these receipts in your blue folder, the ones that we have matching folders. Anything I had to give her I put in that folder. When you guys um, first sent the letter requesting information, I kept trying to call Julia and she would not return my calls. And I went to her house and I was going to help her find her blue folder because I didn't even know if she remembered it even existed even though I kept telling her to put everything in your blue folder. And, but she threw me out. She wouldn't talk to me. She kicked me out of her driveway. And then I was like, wow, this is weird. So I figured we'd all get subpoenaed or something.

Q. Who, so your last involvement with the St. James campaign was the newsletter, correct?

A. Yep.

Q. That was the last thing you did?

A. Yep. And the last time that I saw Julia was, is when I got letters from you guys and it said we were requesting this information. And he called me up and said Julia asked you for information and you didn't give it to her. And so I was like I might as well go try to help her. I guess she's upset or something. And so I went to her house and she was like, she was on the phone, "I can't do this right now, I'm on the phone with a lawyer, I don't have time, you gotta go, go, get, leave" and she slammed the door in my face.

The director took the floor.

Q. The Commission may be interested in obtaining Dan Rogers.

A. Yep.

Q. Um, you said you believed he might be living in Lewiston? Is that right?

A. Stavros Mendros knows where he is because Dan sent me an instant message and said can I have your computers? And at first I said well sure, but then I thought about it and realized that he didn't need my laptop. He was trying to get me to give him my laptop anyways. I thought maybe he was gonna try to steal my computers and run off and just have them and keep them.

Q. You had mentioned a residence where he might be living.

A. Citizen's to Save Maine.

Q. Is that one of those addresses?

A. Ah, Hogan, Cram. You know, no it's not, but I would remember the name of the street. Like his ex-wife has been calling me, "Do you know where Dan is, I need child support." She hasn't received child support in like a year. He owes like ten grand or something crazy like that. She's been calling me, saying you know, like I can't do this DHS child support thing unless I know where he is. So I drove by the name of the.... It's on the corner of Main Street in Auburn. And it's like you go....no, no, Main Street in Lewiston, sorry. It's like you go up Main Street in Lewiston and it's a street that turns on the right somewhere and, um, that is.... It's on the corner. It's a white building, but I don't remember the name of the street.

Q. Are there any businesses nearby?

A. I know across the street it's where, there's like this big huge mansion that is, used to be someone's personal house and now it's offices or something. It's really, really big, like pretty mansion house. Like you notice it when you see it, very nice.

Q. So you mentioned a Chris Rosockos?

A. Chris Raisakis.

Q. How do you spell that?

A. I have no idea.

Q. Raisakis?

A. Raisakis. I can call and get the phone number to this place right now if you'd like.

Q. Yeah. We would really appreciate that.

A. Do you have a phone?

Q. Well, after we're all done.

Q. And does Dan usually use a cell phone?

A. Yeah. Dan gets um, those track phones.

Q. They're like a.... I don't know cell phones. Is that a regular cell phone or....?

A. Yeah. They're a cheap track phones.

Q. Does he have a...?

A. Pre-pay.

Q. Does he have a cell phone now?

A. I don't know. I do know, that after I got rid of, you know, I was trying to get rid of this man out of my life for a very long time, I sent him.... I tricked him into going all the way to California and I told him that I would go with him. And then once he was in California I was like no, I'm done with you. And then he was gone for three months and then he showed up at my door again and, you know, I got rid of him again. And he would do things like, you know....

Q. I'm sorry our Commission members have to get going. You mentioned Danielle who has worked with John Michaels?

A. Danielle did not work with John Michaels. She doesn't know him.

Q. Oh, okay.

A. She works with Stavros.

Q. Would you know her last name?

A. Gizzy. G-i-z-z-y.

Q. Do you know how we would get in touch with her?

A. 515-6989.

Q. Thank you.

Q. I don't mean to pry, but is Dan involved with anyone right now?

A. I wouldn't know that.

Q. Um, and who got you involved in the Dorothy Lafortune campaign?

A. Dan. Dan knew Ben. Ben....

Q. And Ben is who?

A. Ben Chipman.

Q. How could have Dan Rogers taken Ben Chipman's list of you know, voters who were supporting Stephen Beaudette without Ben Chipman knowing it?

A. Ben gave us a list to use for vote-tv calls.

Q. And you also refer to Abe Chipman for his campaign in 2004?

A. Yep.

Q. Were you aware that he has a mental illness?

A. No. I was not. I did, I know after I heard what he did coming up here trying to have himself sworn in. And the representative from Arkansas, um, he seemed a little off and told me he was a little off and weird but he was okay. Um....

Q. And how did you come to work on that campaign?

A. Ben.

Q. Ben who?

A. Chipman.

Q. He invited you?

A. Yes.

Q. On the....the campaign reported a \$3,000 expenditure that Ms. Gardiner mentioned to Dan Rogers and the remark is newsletter production. Are you aware of any value that the campaign got for that \$3,000?

A. Which one? What?

Q. You mentioned that....

A. Are we on like Chipman or St. James or...?

Q. I apologize. We're back to the St. James. That campaign initially paid \$5,000 to Dan Rogers and you got a chunk for about half of that.

A. Right.

Q. Later on the campaign reported giving Dan Rogers \$3,000 for newsletter production.

A. No, that was for the *cartoon* that he *said* he was gonna have the Republicans do. He goes: "Just write me a check and I'll give the money to the Republicans and have print it out." And then Julia said she didn't think it went out.

Q. Where did the campaign get the mailing labels that were eventually use for that newsletter?

A. Julia bought them.

Q. From?

A. I don't know. That was the day I think, oh yeah, towards the end I was involved cuz you know, it was like we didn't talk, but it's like whatever, it needs to be done. Yes. There was one day, I was with her English friend, named Fyre Moon who was over from England to visit. And I was at Staples. I don't know if she was... I was at Staples and then I was....

Q. She's turned over mailing labels for us that are from a Republican voter vault website. Ah, and, what Robert Campbell has testified is that Dan Rogers got them from connections he had within the Republican party. Do you know what connections those would be?

A. Do I know who gave Dan access to the voter vault?

Q. Yes.

A. Ah, no. But I think his name was Tom.

Q. What's his last name?

A. I don't know.

Q. Would it be Mead?

A. I don't know. Well he gave me, he showed it to me and it said TMead as the user name. So I guess so.

Q. What makes you think that this guy named Tom gave them to Dan?

A. Where else would Dan get it?

Q. Did Dan say anything to make you just suspect that?

A. That what?

Q. That he had received them from Tom?

A. Ummm, well the password said TMead so...

Q. Do you know why Dan....do you know on what occasion Dan Rogers received that that access for that database?

A. That's why he wanted my laptop! Okay. Um, no I don't know when he received any type of password. He told me that he had, um, access to a state-wide voter list and I don't know when or who. I never met with any of these people. I don't know anything about it.

Q. It's your campaign, it just seems....

A. I don't know. Dan has always had voter lists! Before he got that like, you know, voter vault thingy he always had other mailing lists too. I don't know where he gets those. That's why we pay him to do the mail, cuz he's got all the mailing lists.

At this time Mr. Ketterer took the floor and thanked Ms. Larlee for going before the Commission to answer their questions.

Q. Does it strike you as odd at all that in the Trundy campaign the reasonable value of your services were exactly \$456 and that is exactly how much money she had for the primary?

A. No.

Q. It doesn't strike you as odd?

A. No.

Q. Um, and....

A. She didn't have. It was uncontested.

Q. Yeah. No, I'm not talking about that. I'm talking about what the value of your services were. What that was...whether she got \$200 or \$2,000 or \$200,000. It just happened. It strikes me as odd that the reasonable value of your service is exactly \$456.

A. Oh.

Q. And that's the exact amount that she got. That strikes me as odd. It wasn't \$400. It wasn't a \$1,000 and you rebated part of it. The reasonable value of service was \$456, which is the exact amount that she got for the primary.

A. Right.

Q. That strikes me as odd. Evidently, it doesn't strike you as odd and that's fine.

A. Well, that's because I was like, well she's not having a primary so I might as well use this to pay. My services are probably worth more than that and you know. So I figured since she didn't have a primary, I don't know, it seemed reasonable.

Q. Thank you. My second concern is this. You about an hour and a half or so ago, ah, hour ago, commented that, you asked the question am I going to be fined because I didn't keep enough of the receipts. And do you remember making that statement?

A. Yup.

Q. Okay and I mean okay. In your mind is that, to you, is that what this inquiry is about? Whether or not you kept receipts?

A. Ah, no. I think this inquiry is about whether or not Dan Rogers does good work or not. That's what I was led to believe about this whole thing.

Q. Kind of a referendum on his talents and abilities as a consultant?

A. Right. Like I you know, when this whole thing started I had no reason to believe that he would not do a good job. He, you know, he told me he used to be chair of the Democratic Campaign Committee. And so I figured, you know, if the Democrat's put him in charge once he left nobody doing. And when I ran, I only lost by a hundred votes and I ran against a woman. I was twenty-one years old. I had not even graduated college. I ran against a woman who was well known and on the school board. And I only lost by a hundred and twenty votes. And you know I probably should have lost by like seven hundred votes. So I figured he does good, you know. I had no reason to believe he didn't.

Q. Well let me just say this, I got to catch a plane so I have to leave and I think the other members will continue on with whatever else needs to be done. But, I'll just tell you that I see it as much more serious than whether or not you kept receipts in a box or have them photocopied or forgot them or they were logged or scanned into a computer and then the computer was lost, stolen, mutilated or destroyed, um, because if you hear the whole days worth of testimony, um, it's really more than about good or bad record-keeping. These are tens of thousands of dollars that we pay to various campaigns of public funds of taxpayer dollars that are given in good faith to candidates and it seems to me that you may well have....and you and Dan together may have recruited, ah, marginal candidates who are not serious about their campaigns in any instances and not serious about the campaign process. And that Dan, in particular, it shows up on an expenditures column as getting substantial amount of undocumented compensation, um, that could be a lot more serious in a civil and criminal sense than simply saying well, we're not good record keepers and we shouldn't, we should have had ten more receipts than we had. And I just want to impress that upon you and....

A. He....



Q. And urge you that maybe you and Dan you know, should get out of the consulting business at least for this election cycle, at least until these matters are sorted out, ah, because I consider this a very grave matter.

A. He told me that what he was getting paid was the same amount that other consultants got paid. He showed me campaign reports where, you know, people paid Ourso Beychok, whatever that means. Like you know, even more money than what he got. And he told me, you know, that, he said that it's okay that he got paid to be a consultant because you know, the Democrats put me in charge of their campaign committee before. They're gonna know that I can do good work, you know, just as good as Ourso Beychok is what he told me. And so you know, he did good. He did a good job on my campaign when I ran. He did an excellent job and I, you know....

Q. He does seem to pick candidates that are publicly financed. I don't see him working on County Commissioner races and Judge of Probate, Register of Probate, Register of Deeds. It's remarkable how he seems to go like a magnet to, ah, elections that are publicly financed by taxpayers. It seems to be his specialty.

A. Third party politics, fringe politics is his specialty. He told me that at one point. He was heavily involved in Democratic Party and that they taught him a lot of stuff about campaigns and that now he wanted to use his skills to help, you know, organize the unorganized people whose voices were not being heard and whose ideals were not represented by the current system and that you know. So yeah, that's what he told me.

Q. Thank you for your candid comments.

At this time Mr. Ketterer left and Mr. Bigos took the floor.

Q. When was Mr. Rogers a member of a campaign committee for the Democratic Party?

A. He told me that he was during the Jerry Brown thing.

Q. My memory, 1992?

A. Yep.

Q. Ah, do you know what title he had?

A. He said he was chair.

Q. Of Democratic campaign committee?

A. That's what he told me.

Q. Was that a state organization office, or....?

A. I imagine it would be a state Democrat thing.

Q. When you helped at the end of the St. James campaign were you paid any cash compensation?

A. At the end?

Q. Like the week of the campaign when you testified that you had helped out again?

A. No, no, I wasn't allowed actually. Well, we were all, okay we went to pick up these things (*indicating newsletters*) and Julia....

Counsel Gardiner. The newsletters?

A. Yeah, we went to get these things. Julia was in charge of getting, um, ah, labels and stamps and Dan had a list and he was gonna print up the labels and he told Julia to have a

bunch of people. And we were all gonna be at my house and we were all gonna go like this...*(indicating putting labels on newsletters)* all day long and put stamps and stuff on them. Ah, the Sun Journal said that they would be all printed by noontime. Ah, they, we got there at noontime and the place was closed. No one was able to be reached. Um, we, eventually, through calling the Sun Journal and different departments of the Sun Journal, were able to get a hold of the owner who sent somebody over to go unlock the building so that we could get these out. And we filled the whole car up with these things and I went back to my house. So we were about an hour behind schedule because the Sun Journal like closed. It was a Sat....I don't know, no, it had to be a Friday. I don't know. The Sun Journal was closed and nobody would open the doors and so it took like an hour for us. We were an hour behind schedule, um, and I got back to my house and Julia was gone and all her volunteers were gone and she took all the mailing labels and the stamps and I called her up and said, "Are you absolutely crazy? If this doesn't get out today it's going to be detrimental to your campaign."

Q. So you helped produce that and made sure that it got to...?

A. Well, well, no. I got....and she said don't worry about it. We're doing it. You know, we meaning her English boyfriend there and Arthur, the one I wasn't allowed to have contact with because he liked me and....

Q. In the interest of time and I am interested in your comments, but I just want to get all opportunities for each other to ask questions. Just, yes or no. Did you work on the mailing, after you described you got, received from the printers?

A. Nope. I....

Q. You didn't work on it at all?

A. No. She took everything to her house.

Q. What did you mean when you said earlier this afternoon: "the work had to be done and I didn't ask questions and it just had to be done so I just, so I just, I helped."

A. What had to be done? What?

Q. I thought earlier and we can go back and check the record, but I thought you said that late in the campaign there was some work that needed to be done and that you put all that was past you past you and....

A. Yeah. That was that day when I let....

Q. What was the work, what, what were you referring to?

A. Getting this stuff out.

Q. Okay.

A. That's what I just told you, that day. And Julia wigged out and just took off back to Hartford with all the stuff and said don't worry about it. We'll handle it.

Q. Do you, let me ask, do you recall any volunteers getting paid in cash during that period of time? Around when you just described you had that involvement?

A. Ah, nope. But all of her volunteers were her people. I wasn't allowed. I was ostersized. I was kicked out. I was....

Q. You didn't see anybody handing out ten dollar bills or fifty dollar bills or hundred dollar bills?

A. No. I did not see.

Q. Okay.

A. I heard there was a big ole party and she gloated about how cool her party was and you know, trying to make me feel bad that I wasn't invited or something and I just, was like whatever, I'm done.

Q. Did you, after your role treasurer terminated and after you became less involved or not involved at all in the campaign, did you ever give any money back to the campaign?

A. No.

Q. When the camera was allegedly stolen was, did you or anybody else report that to any police authorities?

A. No. I told Julia.

Q. Did you tell anybody else it was stolen?

A. Um, I think I may have told my brother because I think at first I accused his friends of doing it because I was....that day I was in downtown Lewiston in kind of like a bad neighborhood where my brother hung out. And, um, there...my brother had his friends in my car and I, remember my brother assured me he didn't have anyone in the car besides Justin and you know. I trust Justin so it was probably, so I concluded it was probably stolen from Wal-Mart.

Q. Do you know where the car, the camera is today?

A. No. It got stolen.

Q. Earlier you said, stated, that you recall Dan Rogers making...about him instant messaging you and something about they want to blame it all on you and Julia. Do you recall?

A. No. He said Julia wanted to blame everything on *me* and that I needed him to defend me and that's why I had to give him my laptop, which had nothing on it.

Q. Do you have any idea what he was referring to from what....

A. Yep. He said, he said, he downloaded something of Julia's testimony off the Ethics website and he wrote down three sentences. So I don't remember two of them. One of them said it was Julia quote, "Dan and Jessica were supposed to bring volunteers up to get signs, to paint signs, but they never did."

Q. Anything else?

A. Which, which was not true by the way. I did. She threw us out because the boy I brought had too much metal in his face. Um, yeah, and so you know, I don't know he was trying to get me all worked up so I would give him my computer but my computer doesn't have anything regarding this campaign on it so....

Q. Is there any other blatant-worthy contact that he was referring to?

A. Um, no!

Q. Do you think there was anything that was wrong about the finances in this campaign?

A. I would like to know where Julia got the money for a flower shop in Wilton. Um, she was very poor. Rob....they were going through a divorce. They might still be going

through a divorce. I know Rob gave her a little bit of money every month, but I don't think it was enough to, you know, buy a cash register for her flower shop and you know, a refrigerator to put her flowers in and you know, pay the rent of this, you know like, it's storefront. It's like in a little strip mall, like ah, downtown Portland you know. Like good storefront. It's in a little village. It's cute. You know, it had nice pile.... I just, I assumed that you know, that, I don't know. When I went there I was like yeah, okay. She afforded this how? And, I was just like, you know, well I didn't sign any reports.

Q. Did Mr. Rogers ever make any statements regarding whether the Ethics Commission would, would, ah, make any gestures of enforcement regarding the spending and finances of the St. James campaign?

A. I believe he told Julia that they would not because they didn't want to make the Clean Election thing look like it was being taken advantage of in case the voters decided they didn't want it anymore. I dunno. I think he....

Q. And what was the implication of that? Was there an inference that because of what you just said he said that um, he did affect the campaign strategy of campaign finance?

A. I don't know. I don't know. I didn't have a checkbook. I didn't.... I wasn't there you know. Dumb little girl with dreadlocks got, you know, shooed out.

Q. So was he, are you, is it your testimony that he was advising Ms. St. James that ah, she could run her campaign in a certain way because the way money was spent wouldn't be thoroughly enforced?

A. I don't know. I know....

Q. Explain more thoroughly what you meant, when you earlier said that you thought this, her campaign would help her out with the criminal charges that were made against her?

A. Well, I mean if it wouldn't help her, you know, I didn't think it would help her get a lighter sentence per say. But I thought it might help her, like you know, make the people aware like, help her, help her image. Like if she, you know, was in the newspapers just a drug dealer and if you know, she could turn that into becoming an activist instead of being a drug dealer. And someone whose fighting for the fourth amendment, you know, the right to have medical marijuana because she, you know, had a head injury and was nauseous all the time;. Couldn't watch television, you know. And so, it would help her public image so that her neighbors wouldn't be scared to speak to her because thinking she's big bad drug-dealer, you know so.

Q. Did you have a role in the Lafortune campaign?

A. Umm, no. I went down there and I did a little bit of work and I was there for like a few days and then I was gone.

Q. You were a volunteer for Lafortune?

A. Uh, no. I received money. I received pay for doing like poll watching and phone calls. I made a lot of phone calls, a *lot* of phone calls.

Q. But when did you make phone calls?

A. Before election-day, within a week from election-day was when I was down there. I, I got there kind of at the end.

Q. Before the production of the postcard, from HOMO-MIM?

A. HOMO-MIM?

Q. Were, did you, were you paid to make phone calls before the production of the HOMO-MIM postcard?

A. Didn't I plead the 5<sup>th</sup> on that?

Q. I thought....

A. Oh yeah, right.

Q. I think it's a separate question, but....

A. Oh yeah, because that thing went out on....it boxes on election-day. I was paid, ah, to do phone calls and ah, poll watching. Poll watching was on election-day though, but the phone calls were before.... I dunno, before.... I don't know how long, how many days. I wasn't there that long.

Q. Same question. Did, except, did Mr. Rogers have a role with the Lafortune campaign?

A. Yep.

Q. What did he do?

A. He, um, got absentee ballots and I think he helped Ben Chipman like do lists. Like you know, when you take, you know, John Smith and, and, and Sarah Smith and mix them into the Smith household and all that type of stuff. Ah, I think, I don't know. He did computer stuff....

Q. Was...?

A. And list stuff.

Q. Do you know if he received compensation for those services?

A. I do not know.

Q. Do you know if he did those services before the production of the HOMO-MIM postcard?

A. It was before.

Q. Ah, you mentioned earlier that, I think it was Mr. Rogers, wanted to create the impression that the HOMO-MIM was sent to a wide universe. Is that correct?

A. Right. Yes.

Q. To whom is he trying to create that impression?

A. The Democratic Party.

Q. And one candidate, Beaudette?

A. Right. I figured he'd tell them, the Democratic Party.

Q. Do you know if he was compensated from any collateral source or from another person, or from another organization for the production of the HOMO-MIM postcard?

A. No. He was not.

Q. Is it self-funded?

A. Yes, by him.

Q. By him? Anybody else?

A. It was purely out of his head. It wasn't like you know....

Q. What was he trying to accomplish by creating the impression that it was such a wide universe?

A. To poison the error of truth as it stabs further into the belly of the beast.

Q. Explain what that fancy phrase means.

A. Um, said that people, these Democrats hide their position on gay rights because they don't want people to know. And that if people knew their position on gay rights people would stop voting for them. And, make them think that the truth was spread further than it actually was would, you know, put knots in their stomach. I don't know. I think it was just meant to make people pissed.

Q. Was John Michael involved with the Lafortune campaign?

A. No. As far as I know John Michael moved away to Utah a very long time ago after his gubernatorial race.

Q. Now, regarding the Trundy campaign. Did you have a campaign plan?

A. A campaign plan?

Q. Either written or not written?

A. Um, well, I had....not written. I think at one point I did write a campaign plan for Sarah and showed it to her. And cuz I remember I had left a rock there. I think it was a piece of celestite that Julia gave me and that Julia stole back from me. And um, yeah, I left a rock on the notebook. So I did write a campaign plan out for Sarah. I don't think she looked at it very thoroughly. Um, I'm not quite sure what it said, but I think it was like, you know, ah hit hard on agriculture, push the youth vote.

Q. Do you have a copy of that, or would she? Do you know anybody that would have a copy of that?

A. I don't know. She also gave me a bead for my hair that night. I don't know. It's probably gone. I mean, I just scribbled it on some scrap paper and showed it to her. Unless it's still in that notebook which might be in her house, but you know.

Q. And what was the plan to contact voters to develop votes, other than billing off, or writing off her name recognition, popularity that she came into the campaign with?

A. It was to, um, get youth vote, make the youth come out and want to vote because there was a Green. It was to, um, you know, make the marijuana supporters actually get up off the couch and vote. Um, it was to .go after, you know, both liberals and conservatives alike with a, you know, like, like a Green that has kind of a conservative thing. Where she was like pro-guns and um, you know, she didn't like taxes she told me. But you know, she was all for agriculture and you know, against pollution and stuff. So that was basically a balance and um....

Q. And word of mouth was the way that these strategies were going to be accomplished?

A. Mail.

Q. And remind us again what mail was sent in her campaign?

A. Umm, I had a bunch of stuff. And you know, there was a template that was like, it was on the computer and Dan showed it to me and it had hearts and moons on it and I believe it had, you know, the stuff about agriculture. It had like stuff about taxes.

Q. How many, how many, how many pieces got mailed?

A. I don't know. He said that everybody would get at least one and some people would get more.

Q. And...?

A. Like the marijuana supporters and the youth vote would get more.

Q. And was the campaign successful in the word-of-mouth campaign?

A. Um, I believe so because I have had people come up and be like, "yeah, I voted for Sarah Trundy." You know, I mean, I think that both of these campaigns, you know, St. James. I still have people from like far away talking about it and I don't know why. You know, so yes, I do believe it was *extremely* successful. Um, you know. The hippies came out and they voted.

Q. Is that kingpin Fuda or who?

A. His name is Aaron Fuda.

Q. To whose credit; is it Mr. Fuda's credit or to whose credit did that word-of-mouth came, become effective?

A. Aaron Fuda.

Q. Okay.

A. Cuz, he like you know, That's like saying hey, ah, you know Willie Nelson said to vote for this guy and so all the Willie Nelson fans will go vote for him, you know.

Q. I just have a few more questions about Mr. Rogers... what you described. You said activity perhaps back in the early 90's?. What other campaigns was he involved with before this one?

A. Um, when I, when I first met Dan, like you said he was doing John Michael for Governor and he was working on Mendros for Congress. Um, he has helped Belinda Gerry, her brother Bruce Gerry. Um, he's helped Elmer Berry. He's a county commissioner. He's helped, um, city council people, ah, ah, Leah Poulin. She's a school board member on, in Lewiston. Leah Poulin. Um, he said that he worked on time limits to, ah, put time limits. And he worked on, he said he did, he worked on the repeal of the Snack Tax; which was a referendum. Um, so you know, saying that he only picks on Clean Election candidates, I... that's like not even true. I think he works on many campaigns. He worked for Jason Toothaker, Portland school board race. You know, many of these campaigns he's *not* paid and he goes and helps anyways, so.

Q. Do you know if there's a 2004 general election he was working on in any other campaigns besides ah, Trundy and St. James?

A. Trundy and St. James.

Q. Any others?

A. Chipman. He did mail for Chipman.

Q. Any others?

A. Um, I don't remember. Like, I think Leah Poulin may have been that election cycle...that may have been a previous one. I don't know the school board lady.

Q. Yep.

A. Um, I don't think so. Unless there were, were there referendums going on at that point? I don't know.

Mr. Bigos thanked Ms. Larlee and Mr. Cassidy took the floor.

Q. I have a question. Earlier when Commissioner Ketterer was speaking about how he received the list, the voter list, from the Republican National Committee, there, all of a sudden this light came on and you said, "Oh that's why he wanted my laptop." What did that have in relationship to the...?

A. It's on my laptop.

Q. It is on there?

A. Yeah. Yeah, there's a statewide voter list on my laptop.

Q. But didn't you think it was kind of suspicious that he wanted your laptop other than you though he was going to steal it?

A. Well, it didn't occur...I forgot that that was on there. Like, since I've had that computer, like, the internet connection, modem busted or something and I have no floppy drive. So there's no way for me to get information from that computer to any other computer. I can't email it. I can't put it on a floppy. I have no cd burner. So um, you know, so I just basically only used that computer to write fiction. I'm writing a novel. About like you know, aliens and stuff. And um, so, like, I forgot that there was a voter list on there cuz it's like you know, I don't...I dunno. I just forgot. And so I thought he just wanted to steal it, but I guess that's probably why he wanted my laptop, was because that list was on it.

Q. Okay.

Mr. Cassidy thanked Ms. Larlee and Chair Ginn Marvin took the floor.

Q. Um, who did Sarah Trundy run against?

A. Um, Kenneth Roberts and Joan Bryant-Deschenes.

Q. Who won?

A. Joan Deschenes.

Q. What were the percentages?

A. Um, I don't know but we beat Kenneth Roberts in the town of Minot. And, ah, Joan Deschenes won. Ah, we lost in Turner and I think we came in third place in Hebron as well. But it was very close in Hebron between Sarah and the Democrat. But in all three towns, the Republican was, you know, pretty much ahead, Joan Deschenes was.... She, she's an incumbent.



Q. What were the issues in that race? I understand it had to do with farming, but what else?

A. Um, taxes, tax cap, um ah. I know what our issues were. I know I got, got what was his name...Kenneth Roberts. I got his mail and you know, it looked like typical Democrat mail. It had all the mainstream Democratic issues on it and you know, like education, healthcare, you know, jobs healthcare education which is like everywhere. It was basically that stuff. You know, the ah....

Q. Did Sarah speak at any public events?

A. Nope.

Q. Were there any forms, any debates, anything like that?

A. No, I don't think there were any.

Q. And there was nothing?

A. If there were, I was not aware of them.

Q. And there's nothing mailed out on her behalf either?

A. What do you mean mailed out?

Q. There was no mailing done?

A. Yeah. There was all kinds of mailing. I just told you. There, well, for Sarah?

Q. Yes.

A. Yes.

Q. For Sarah?

A. Yes. We sent mail. It had moons and stars on it.

Q. But nobody has a copy of it?

A. Dan does. Well, it was on his computer and his computer has been, ah, I still have the computer but it's all busted up. And it got like, reform...the hard drive got reformatted and he had a million viruses. And so he decided to just like erased everything and put in a new operating system. I guess he put in like, he put in Windows Millennium or win.... I don't know. He put in one of those. When he did it, he moved where the power button was and so, it's like the computer still works but it's like if you are on there typing all of a sudden it goes "tshnk" and it will just like, zap off, because the power button is so touchy.

Q. And so you're saying you have a copy or you don't have a copy?

A. Ah, no, it was on Dan's computer. I gave Sarah a copy when it was made. I said, "Look, this is your mail."

Q. That's interesting because Sarah said she never saw it.

A. Well, I gave her some. I mean, I don't know if Sarah, you know, doesn't think she ever received anything from the Ethics Commission either but I know she did.

Q. Okay, um, can you tell me what percentage of the vote Julia got?

A. Um, four I believe overall. Fifteen percent in Buckfield and....

Q. That's fine.

Q. Does Julia still have that flower shop?

A. No, she never opened it. She like, had it and was gonna open it and then she wasn't gonna open it anymore. She was done with it. It fell through or something. I dunno.

Q. And when you got the 23, 4 or 5 hundred dollars cash that you received on Julia's campaign...?

A. Uh huh....

Q. Did you report that to the Section 8 housing people?

A. Yes, I did. That's why my rent went up and so I just gave basically all of it to my landlord. I think I kept a \$100.

Q. Um, the laptop, you...I think you might have answered this when the Commission asked you. In the beginning, you said you didn't see why he wanted your laptop because it didn't have anything to do with the campaign.

A. Right.

Q. And then later on...you said....

A. I remember it had a voter list on it.

Q. It had a voter list. You also talked about other things that were on it because you said you took it up to Julia's.

A. No, that, that, okay. I had a Dell Inspiron 5000 during the Julia St. James campaign. And my, my settings, my display settings, okay, display setting are quite easy to fix but I didn't know if my display settings were off because...I don't know. The internet switched it on me or some...and anyway, it was all black and it would only show me things in safe-mode and so I took it to a computer guy. The computer guy says, "Oh, do you have an extra power cord because I have this old Dell Inspiron 9000 which was a similar laptop only faster, more hard drive." It was like 5000 and 9000. And um, I'm like here, and he was like yeah, somebody gave me this computer because somebody spilled soda on the...um...the thing, the keyboard and there's soda in the hard drive. He says, "It's been sitting in my basement for six months so maybe the sodas all evaporated and I can get it to work again. So I want to use your power cord to see if I can get it to work." And so I'm like yeah, whatever, just fix my computer, you know, and then I come back the next day and he didn't know, he totally lied. All that I had to do was like switch the display settings from like 350 to 450 or whatever those numbers are.

Q. Thank you.

A. He pirated it anyway so I don't have that computer anymore. And Dell does have it reported as stolen too if you want to call them.

Chair Ginn Marvin thanked Ms. Larlee and the director stated he only had a few more questions.

Q. We would be interested in, having you email to us anything that's on either of your computers relating to the St. James or to the Trundy campaign. Would you be willing to do that?

A. Um, yeah, I can't email. The only thing I have on my laptop is the voter list. You don't need that do you? I can't email from that computer. I don't have a floppy drive either. I'd give you the whole thing, but....

Q. The whole laptop?

A. Yeah, I'd have to...but if you want it.

Q. *(to the Commission members)* Do we want that?

A. *(it was deemed not necessary)*

Larlee: But technically um, I believe that when you, um...um, when you get the voter list you sign a thing that says you are not using this for any, any uses not approved by your state or local Republican party. If I give you that then I would be in violation of that and I don't need a report saying that!

Q. Do you think that the St. Jam...that Dan had permission to provide that mailing list to the St. James campaign?

A. I doubt it.

Q. From anyone in connection with anyone in the Republican Party?

A. I doubt it. I doubt you know, I mean...what, did Rob have a password? Did he give Rob a password to go on and use it? Or Julia? Cuz that's not...I doubt that would be allowed.

Q. And earlier you had mentioned something. I don't... this might not be your exact testimony but, when I asked you who in the Republican Party might have provided access to that database to Dan Rogers you mentioned somebody named Tom.

A. It was probably Tom Mead because the password, the log-in password said TMead.

Q. Did Dan say anything else to make you believe that?

A. Um, I think he.... I dunno. He was talking with all these guys and he said, "Oh, I gotta go meet with the Republicans, eh." And he'd like go off and he met with a guy named Tom, so you know. Tom.

Q. And it might be natural for any of us to think that he got this database from Stavros Mendros because you've mentioned a couple of times some connection between Dan and Stavros, but....

A. How would Stavros Mendros have Tom Mead's password?

Q. Well, I was just looking for any light you could shed on that.

A. Oh, I, I doubt it because of...um. I was at Stavros's house before and I asked him if I could use, if he had a voter list I could use. And I wanted to look up something like in the town of Minot or something and he's like no, I only have Lewiston. And I was like you know, I thought you had that voter vault thing. He's like but my password only accesses Lewiston because that's the only place, that's my only race, that I've run is Lewiston. And so, you know, I guess that like, you know, if, say if I were to run as a Republican in you know, Minot, Hebron, Turner, I think the Republican's would probably, you know, if they wanted to share that with me they would give me a list of *just*

Minot, Hebron, Turner and that would be *all* I would be able to access. So I don't think Stavros had access to the whole thing.

Q. Did Dan Rogers perform work on the Ralph Nadar campaign?

A. Yes.

Q. Were you, did you help out on the Ralph Nadar campaign at all?

A. Nope.

Q. Did you ever see Dan make use of the Republican voter vault database in connection with the Ralph Nadar campaign?

A. Nope, Nadar didn't have mail or nothing. Basically um, Dan was supposed to handle...I think.... I don't know. I didn't work for Nadar. I'm not quite sure what Dan's job description was, but I do know that he had my brother and Kyle to run a van. And my brother and Kyle's job was, they had these little scripts and they flew down to Washington DC to pick up a van. They drove it home. It had a megaphone. They were supposed to do things like: Day 1, you go to Burger King and you say...Hey! Do you want to super-size your wages? And you read off statistics.

Q. I don't mean to cut you off but....

A. Oh, okay, but that's all I know about Nadar.

Q. And my very last question. Following the literature regarding Stephen Beaudette, there was more literature that was very similar to that, had a lot of the same language on it, except it was about Howard Dean and it reported that Howard Dean supported gay marriage and so forth.

A. I don't know.

Q. Have you, um, did you know whether Dan Rogers was involved in that mailing?

A. I would assume so but I don't know ..for sure.

Q. Were you aware of that mailing at all?

A. No, after it hit, after it was sent out, it was in the newspaper. I read the newspaper and stuff.

The director stated he did not have any more questions and thanked Ms. Larlee for whatever information she would be willing to give the Commission. Chair Ginn Marvin reminded Ms. Larlee not to discuss this interview with any of the other witnesses.

Counsel Gardiner explained that a subpoena had been issued to Dan Rogers for him to appear before the Commission on that day; but they were unable to reach him. She thought that another subpoena should be issued for Mr. Rogers.

It was decided that the Commission would wait until the next meeting to hear the testimony of Dan Rogers.

There being no further business, the Commission adjourned.

Respectfully submitted,

Jonathan Wayne  
Executive Director